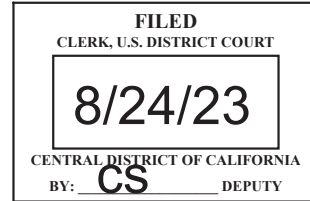


Amber Doe  
P.O. Box 20  
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Los Angeles, CA 90211  
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[amberlitigate@gmail.com](mailto:amberlitigate@gmail.com)  
Propia Persona



UNITED STATES DISTRICT COURT  
DISTRICT OF CENTRAL CALIFORNIA

Amber Doe,

Plaintiff,

vs.

Michael Lewis Goguen, Sequoia Capital, Two  
Bear Capital, Quinn Emanuel, Wilson, Sonsini,  
Goodrich& Rosati, Goodwin Procter, The United  
States of America, Cristopher Reynolds, Galser  
Weil, Bisnar Chase, Nemeck and Cole, San  
Mateo Court Orange County Court, Oranch  
Couty, San Mateo County, See Interested parties

Case No. 2:23-cv-06439-MEMF-SK

**Plaintiffs MOTION TO DISQUALIFY QUINN  
EMANUEL URQUHART & SULLIVAN LLP**

**DEPT: 6A  
JUDGE: Chief Philip S. Gutierrez**

TO THE CLERK OF THIS COURT AND ALL OTHER INTERESTED PARTIES AND THEIR  
ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that **CAPACITY OF PARTY SUCH AS PLAINTIFF,**

**NOTICE OF MOTION AND MOTION TO ALL PARTIES AND THEIR ATTORNEYS OF**

**RECORD: PLEASE TAKE NOTICE that on Friday August 24th, 2023 or as soon thereafter as**

1 may be heard **IN THE INTEREST OF JUSTICE** by Chief Judge **HONORABLE PHILIP S.**  
2 **GUTIERREZ.**

3 **First Street Courthouse, 350 West 1st Street, Courtroom 6A, 6th Floor , Los Angeles**

4  
5 **of the United States District Court for the Southern District of California, Western Division**

6 **Los Angeles will and hereby do move this Court for an order disqualifying Quinn Emanuel**

7 **Urquhart & Sullivan, LLP (“Quinn Emanuel”), from representing Michael Lewis Goguen,**

8 **Sequoia Capital, Two Bear Capital, Any and all companies owned By Michael Lewis Goguen ad**

9 **Sequoia Capital, They must not be allowed to represent any defendant in the instant case as**

10 **they have a self serving reason to do so in furtherance of obstruction of justice The must be**

11 **barred from representing any and all parties in this action. Amber Doe respectfully requests**

12 **that the Court disqualify Quinn Emanuel lawyers from representing QUINN EMANUEL**

13 **URQUHART & SULLIVAN LLP .**

14  
15  
16  
17  
18 Quinn Emanuel have a monopoly on the legal profession and act at all times in regards to Plaintiff

19 Amber Doe with SUPREME and Absolute Malice. These criminal Quinn Emanuel lawyers must

20 forever be barred from interfering on any way with Amber Doe’s medical treatment and hiring men to

21 stalk Amber Doe and unknowing 3rd parties.

22  
23  
24 For all intents and purposed many of the Quinn Emanuel Lawyers in the instant case should be

25 disbarred however they bribe lawyers at the state bar and the complaints against them for their

26 criminal activities get removed and vanish from the system altogether. Their relentless abuse of

27  
28

1 plaintiff life and continued conspiracy to obstruct justice has now gone on for 9.5 years since Diane  
2 Doolittle decided that I did not need a lawyer and That her client who has no law degree and his  
3 lawyers could act on my behalf after convincing me that my lawyer was a criminal who was stalking  
4 me and would harm me and steal all of my money.  
5

6  
7 Goguen and his lawyers wrote a personal injury settlement agreement forced me to sign it called  
8 me up to 25 times per day for months on end, instilling fear in me of all types until I signed the  
9 arrangement that they wrote. Months after I signed the agreement created by these lawyers with  
10 combined thousands of years experience Diane Doolittle the ring leader in the conspiracy to obstruct  
11 justice called me multiple times telling me I better listen to her that she was the former sex crimes  
12 prosecutor. She set up multiple meetings for me to go to her office alone and didn't show up after I  
13 travelled all the way there.  
14

15  
16 Quinn Emanuel continue to not serve me any pleading in the lawsuit in Orange county where I am  
17 being sued for 100, million dollars because Diane Doolittle made me fire my solo practitioner lawyer.  
18 Diane Doolittle contuse to tamper with Justice Steve Kim and Justice Maame Frimpong who exert I  
19 can not have a trial against any of my traffickers abusers exploiters companied my former lawyers the  
20 surgeon or anyone else who has harmed me because the Judicial corruption and bribery in JAMS and  
21 the state court judiciary would become known and the piublics right to know that there is a serial  
22 rapist pedophile sex trafficker tax evader walks amount them and their daughter outweighs his right  
23 to cover up the numerous crimes committed.  
24

25  
26 Quinn Emanuel has whole invalidated the United States Constitution with there reprehensible  
27 obstruction of justice making it so that any and all sexual exploiter can refer to these ruling and denial  
28

1 of due process and state the sex crimes and trafficking crimes they commit should not see th light of  
2 day in a court of law and the plaintiff should be denied a jury trial on the grounds that Corrupt Judges  
3 are immune and rapists and traffickers child molesters and pedophiles will be defamed.  
4

5  
6 This is unacceptable abuse of society.  
7

8  
9 All lawyers from Quinn Emanuel must be Wholly Disqualified from my life and further exploitation  
10 of my life long circumstances of abuse slavery raped and trafficking.

11 Please review the totality of Chief Judge Laura Taylor Swains

12 If the my right to a trial by jury is deprived I have no choice but extradite these people under the laws  
13 of Canada and the UK where the crimes also took place and where I will be allowed the right of Due  
14 process. Quinn Emanuel Extrapolate that I can be deprived of the right to say anything that is 100  
15 percent true in evidence and there are hundreds of witnesses that state it is in evidence.  
16  
17

18  
19 They put these lies in front of judges all over the country. I never lost a trial based on evidence,  
20 testimony and fact.

21 Quinn Emanuel bribed a judge intrinsically and extrinsically defrauded a court. Caused a court not to  
22 function.  
23

24  
25 Quinn Emanuel have broken every law you can find to break. Diane Doolittle Continues to tamper  
26 with state and federal judges and she continues to bribe the state bar.  
27  
28

1 Quinn Emanuel and their co-conspirator in Canada at Lenczer Slaught have caused the  
2 illegal freezing of 3rd parties accounts causing them to suffer numerous economic issues.  
3

4  
5 Most Recently Quinn Emanuel and their Co-Conspirators now illegally gained access to  
6 private documents that are 3rd parties that you can not by law possess Through their illegal gaining of  
7 access to a safe deposit box with no court order to enter said safe deposite box.  
8

9  
10 Quinn Emanuel caused the breakdown of judicial relationships between foreign countries. Quinn  
11 Emanuel caused the chief of police to step down when you they knew Goguen the serial rapist was  
12 bribing detectives to destroy evidence and cover up sex crimes he committed against minors.  
13

14 Quinn Emanuel are now you are attempting to deprive The former chief of police who served the  
15 community without fail for over 40 years of his livelihood so that Quinn Emanuel can get millions  
16 from the New York post which printed nothing but the truth about Michael Goguen that he is a serial  
17 rapist worse than Harvey Weinstein and Jeffery Epstein and I know that from having had the  
18 unfortunate experience of dealing with both of those sexual predators.  
19

20  
21 They were able to get away with their rape and trafficking of girls and women for decades for the  
22 same reason Michael Goguen has gotten away with it because of corruption and bribery.  
23

24  
25 My Case must not be sealed in the interest of Justice. Plaintiff must proceed to trial on the merits of  
26 my case.  
27  
28

1 My Motion To disqualify Judge Steve Kim And Judge Maame Frimpong for their prejudice and  
2 corruption is before the court now and no motion to seal the case is to be ruled on before they are  
3 disqualified for the reasons set forth in the Motion to disqualify the judges.  
4

5 I hereby oppose the sealing of the case in the interest of Justice and For the People of America who  
6 have the right to know.

7 You have caused my death and continue to do so on a daily basis. You caused my lawyers to breach  
8 their fiduciary duty to me.  
9

10  
11 Quinn Emanuel bribed witnesses, bribed judges, suborned perjury, and are criminals.  
12

13  
14 Diane Doolittle is the ringleader in all of this starting with depriving me of Rivers Morrell solely for  
15 the purposes of beating me into submission with her exertion that she was the sex crimes prosecutor.

16 If all lawyers were allowed to pervert the course of Justice as Quinn Emanuel have there would be no  
17 courts of law and no law firms and no need to hire a lawyer with expectation of due process.  
18

19  
20 It is in evidence that Goguen has raped and sexually abused multitudes of women and girls.  
21

22  
23 Goguen forced many of them into similar agreements to what I signed and or made payment to their  
24 parents.  
25

26  
27 There are hundreds of witnesses that state Goguen's wives were prostitutes and he spends most of his  
28 time procuring prostitutes

1  
2 There is not a Psychiatrist in the country that would not concur that Goguen is a deranged  
3 psychopath. Pshycopathy is a medical term applied to this with anti- social personality disorder.  
4

5  
6 Goguen is guilty of years of IRS fraud and using the victims that he sexually abused so that he could  
7 gain a tax break that is in evidence with the IRS.  
8

9  
10 Multiple of the victims have called, written or had other people call to say they have agreements and  
11 that Goguen did similar things to them and that he stalked them relentlessly.  
12

13  
14  
15 Jamie Stevenson, Alice Vasqueze, Jordana Woodland and Melina Rose Sonju were all full time  
16 prostitutes they were publicly known as prostitutes it was never a secret they were not trafficked they  
17 partied all day and had sex with dirty old men.  
18

19  
20 Quinn Emanuel that they believe they are so above the law that they can simply just break the law all  
21 day everyday. They are admonished by the entire legal community, the judiciary and will be shut  
22 down as a whole for their mafia-like activities.  
23

24  
25 Defamation is a statement made to the news that is untrue that harms someone's character.  
26  
27  
28

1 It is Quinn Emanuel that sold my photos to the news to harm me and told the media that I am a racist  
2 which is completely untrue. They have no reason to allege that i am a racist they have no evidence  
3 that i am a racist.

4  
5 no reason to call me a racist or to tell the news to print that I am a racist.

6 I am suing the news because that cased me even more damage and damage to people in my life.  
7  
8  
9

10 I do not have a duty to serve documents and legal proceedings until I have a summons which I do not  
11 have since Diane Doolittle insists she can tamper with every judge in the land and hide behind the  
12 fraudulently procured restraining order Signed by Elizabeth Lee after Quinn Emanuel intentionally  
13 gave me the wrong dates and times for the hearings so that I could not defend myself or make  
14 arguments.  
15  
16  
17  
18

19 Quinn Emanuel will not be able to pervert the course of Justice like this in Canada or the UK and I  
20 am extraditing them to stand trial in both if I am yet again denied due process in the United States.  
21  
22

23 Quinn Emanuel are really sick diabolical criminals. Who should be jail for the crimes they have  
24 committed yet they contuse to maliciously prosecute me and have me stalked by investigators  
25 constantly.  
26  
27  
28



1 Kyle batter exerts that his tampering With judge Maame Frimpong and judge Steve Kim is  
2 somehow my losing in court.

3  
4  
5 There is still something called due process and the United States of America.

6 Diane Doolittle is well aware that she deprived me of my right to proceed to trial under a  
7 pseudonym to protect me from further harm but instead she forced me into the personal injury  
8 settlement agreement so she could create 9.5 years of income for herself but later telling me I  
9 extorted the serial rapist and the repeat silencing agreement maker.  
10

11  
12 I am allegedly not allowed to say that Goguen forced prostitutes to have abortions? When more than  
13 30 of them have called to say he paid them to abort pregnancies that he drugged and he fisted them,  
14 had orgises, did cocaine and asked them to procure the youngest girls possible to bring to the room.  
15 That Goguen paid their pimps.  
16

17  
18  
19 I am not supposed to speak the truth which is in evidence that there are literally hundreds of  
20 women's lives destroyed by that psychopath but her wants the world to think hes just a philanthropist  
21 just, a do-gooder save the world with his grandiose ideas that he is ending climate change, ending  
22 human trafficking, stopping homelessness, stopping mass shootings, oh and lets not forget he is on  
23 the brink of curing cancer.  
24

25 Yet Goguen and his agents are paying to interfere in official government business bribing law  
26 enfacement and bribing Judges causing society to deprived of safety and a justice system.  
27  
28

1 In actual fact all Goguen has done is leave countless bodies and minds of girls and women  
2 destroyed.

3  
4 All people have the right of access to the criminal and civil justice systems. And it's a crime that  
5 you are obstructing the course of justice.  
6

7  
8  
9 How many years have I been demanding service of legal proceedings? How many emails have I  
10 written asking to be served pleadings, discovery, motions, depositions?  
11

12  
13 Yet Kyle Batter exerts that I have made no attempts to serve them.  
14

15  
16 The government must shut down the mafia at Quinn Emanuel.

17 They are worse than the Hells Angels because they purport they are upstanding citizens but violate  
18 every law in the land.  
19

20  
21 Amber Doe HEREBY OBJECTS to QUINN EMANUEL URQUHART & SULLIVAN LLP  
22 Repressing Michael Lewis Goguen Repressing the law firm of MOTION TO DISQUALIFY QUINN  
23 EMANUEL URQUHART & SULLIVAN LLP or any other Defendant in this lawsuit They are both  
24 witnesses and defendants in the instant case. They are a mafia of unethical lawyers guilty on all  
25 counts of legal misconduct of the ENTH degree they have obstructed the judicial Process in regards  
26 to Amber Doe for well over 9 years see the Complaint in the instant case. they Continue to violate  
27  
28

1 Amber Doe's human rights, Civil rights, Constitutional rights. QUINN EMANUEL URQUHART &  
 2 SULLIVAN LLP and all lawyers associated with them working in collusion to force Amber Doe to  
 3 Die Prematurely have become her Human traffickers illegally profiting ff of Amber Does sexual  
 4 exploitation they have participated in but not limited to. Bribing Judges, Controlling Jams Referee  
 5 Reed Ambler Who Amber Doe Was Forced to pay \$900.00 Per hour to act as discovery referee only  
 6 not a motion Judge, fraudulently inducing Amber to to Fire her lawyer ,Conspiring with Amber Does  
 7 Lawyers, Paying Amber Does Lawyers to abdomen Her case. Tampering with and Threatening  
 8 Amber Does Doctors and Surgeons, Paying Lawyers and Judges In Canada to Deprive Amber of Her  
 9 Rights, Bribing 3rd Party Witnesses Lawyers, Suborning Perjury, Hiring and Instructing multiple men  
 10 to stalk Amber Doe and more that 60 Third parties some of which had never hear Of Amber Doe,  
 11 Stalking and threatening the elderly , Cancer patients, Stalking Single mothers, doing Video  
 12 Surveillance on Small Children on private properties, Paying money to witnesses to give false  
 13 testimony, tampering with witnesses, The lawyers themselves went to doorsteps of other rape victims  
 14 and paid them to remain silent, Attempting To silence Amber Doe so that Michael Lewis Goguen can  
 15 Continue to rape and violate girls and women through his sex trafficking conspiracy Goguen Sex  
 16 enterprises, Providing Amber Doe with FAKE hearing dates so that she can not defend herself in  
 17 court, Not serving Legal pleadings to Amber Doe, Lying to the police and sheriffs about the Stalking  
 18 of Amber Doe, Inciting gang violence intentionally, Fraudulently inducing the Courts and  
 19 Fraudulently procuring Judicial Signatures on documents knowing "they" Goguen and Quinn  
 20 Emanuel are in violation of 244 Laws and causes of action.

21 MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP at any further  
 22 hearings or proceedings concerning this action. Said objection is based on the grounds and upon the  
 23  
 24  
 25  
 26  
 27  
 28

1 facts set forth in the declaration of Amber Doe and exhibits attached thereto, concurrently filed and  
2 served herewith and incorporated herein by reference.  
3

4  
5 **MEMORANDUM OF POINTS AND AUTHORITIES**

6 **I.**

7 **STATEMENT OF FACTS**

8  
9 This case is **CIVIL ACTION For Human Trafficking Rape And 242 additional causes of**  
10 **action and Violations of the law by the perpetrator Michale Lewis Goguen his lawyers**  
11 **companies agents “investigators and all people hired by them.** Quinn Emanuel lawyers have  
12 acted in SUPREME ABSOLUTE MALICE and have obstructed justice on behalf of Micheal Lewis  
13 Goguen for over 9 years and Victimized Amber Doe  
14

15  
16 Amber Doe objects MOTION TO DISQUALIFY QUINN EMANUEL URQUHART &  
17 SULLIVAN LLP at any further hearings or proceedings concerning this action on the grounds that a  
18 person aware of the facts might reasonably entertain a doubt that theses malicious lawyers could  
19 conduct themselves with in the law and what would be considered reasonable by society. They are  
20 one of the most powerful law firms in the country they have connecting to the government and the  
21 judiciary. They must be disqualified from the instant case for they will continue to obstruct Justice and  
22  
23 Amber Doe will forever lose her life and right to a trial by Jury.  
24

25 They render the courts unable to function thru their constant abuse of the legal process. The just  
26 would never be able to be impartial he has already been made aware that Plaintiffs rights have been  
27 violated and that she is not being served the pleadings or times and dates that MOTION TO  
28

1 DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP who are both witnesses and  
2 defendants in the instant and are proceeding before the Judge and obtaining his signature on legal  
3 documents without serving Plaintiff or informing her of hearings. Refer to court record.  
4

5  
6  
7 The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the  
8 grounds that: This case was filed March 28th 2023. Within 5 days of the date of filing the complaint  
9 for human trafficking rape premises liabilities and 241 additional causes of action and violations of  
10 the law The fee waiver should have been granted as I have declared under penalty of perjury that I  
11 can not afford to pay for filing fees in the instant case or the the filing fees in the several other cases  
12 where my situation of human trafficking is being explored for profit by dozens if not hundreds of  
13 lawyers from the largest law firms in the unites states. 50 days after the filing of the fee waiver it still  
14 has not been granted by Hon. Steve Kim.  
15

16  
17 Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful  
18 defendants has no law degree and is in dire need of medical treatment which has been removed from  
19 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
20 denied Legal Aid And public Counsel.  
21

22 In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His  
23 lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and  
24 refused to serve a single pleading or notice to Amber Doe although she makes several demands for  
25 service of the pleadings per week.  
26  
27  
28

1 Amber Has today the Court that she is not Being served legal pleadings discovery motions or  
2 anything related to at least tree cases where she is either the plaintiff or defendant.

3  
4  
5 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the  
6 Lawyers in this case since Feb 2014. It is Now May 2023.

7  
8  
9 Amber Doe Does not know how the Lawyers from Quinn Emanuel are obtaining Signatures From  
10 Hon. Steve Kim on the motions they file as she can not see any hearing date nor can she see any Nor  
11 can she see underrated pleadings because they are not on pacer.

12  
13  
14 Plaintiffs motion for Defendants Judgement Should be granted not Delayed as the law is clear  
15 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint  
16 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim  
17 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
18 humanity.  
19

20  
21 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
22 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
23 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
24 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
25  
26  
27  
28

1 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form of  
2 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has  
3 never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
4 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
5 it was procured through fraudulent inducement of a judge and bribery Such gag order was signed first  
6 by Hon. Danny Chao after he was bribed. The Second Order signed By Hon. Elizabeth Lee after  
7 Quinn Emanuel Lawyers again acted with Malice and Served plaintiff only the pleadings they felt  
8 like serving plaintiff and intentionally obstructed the Judicial process by Suddenly changing the date  
9 of the hearing and in addition providing Plaintiff with a fake Hearing time of 1:00 pm when they  
10 knew the hearing was set for 9:00 am and they did not provide playoff of the court room nor the  
11 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or  
12 defend herself.  
13  
14  
15

16  
17 The Court Denied Amber Does request for E-filing for no reason. It is mandatory for the lawyers to  
18 utilize e-filing. Plaintiff has expressed that she is homeless without medical treatment and this will  
19 cause her a pre-mature death. She has no money to pay for shipping fees for filings she has no money  
20 for paper and printing services. E-filing is extended to mostly everyone else and is better for the  
21 environment. The request for exiling should have been granted.  
22  
23  
24

25 The court exerts that Plaintiff made Ex-parte Communications to the Court which lawyers and  
26 People without lawyers are allowed and instructed to email the clerk and the clerks email them in  
27 response. Plaintiff never spoke to the Judge nor did she bribe the judge she followed the instructed  
28

1 protocol. The Clerks in the office instructed Amber Doe to email the Clerk and speak to the Deputy  
2 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
3 Judgement heard Before the Judge.  
4

5 Again If defendant Michael Lewis Goguen and His lawyers did not force Amber Doe to fire her  
6 lawyer and subsequently bribe and conspire with her former lawyers plaintiff would not be  
7 requesting a hearing time from the deputy clerk.  
8

9  
10 Plaintiffs motion for Defendants Default Judgement Should be granted not Delayed as the law is clear  
11 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint  
12 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim  
13 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
14 humanity.  
15

16  
17 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
18 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
19 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
20 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
21  
22

23  
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25 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has  
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27 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
28



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8 defend herself.  
9  
10

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15 for paper and printing services. E-filing is extended to mostly everyone else and is better for the  
16 environment. The request for exiling should have been granted.  
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19

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21 People without lawyers are allowed and instructed to email the clerk and the clerks email them in  
22 response. Plaintiff never spoke to the Judge nor did she bribe the judge she followed the instructed  
23 protocol. The Clerks in the office instructed Amber Doe to email the Clerk and speak to the Deputy  
24 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
25 Judgement heard Before the Judge. Again If defendant Michael Lewis Goguen and His lawyers did  
26  
27  
28

1 not force amber Doe to fire her lawyer and subsequently bribe and conspire with her former lawyers  
 2 plaintiff would not be requesting a hearing time from the deputy clerk.  
 3  
 4

5 Bias exists where the judge evidences a “predisposition to decide a cause or an issue in a  
 6 certain way, which does not leave the mind perfectly open to conviction.” The judge's bias toward a  
 7 party is clearly ground for disqualification. *Pacific & Southwest Annual Conf. of United Methodist*  
 8 *Church v. Sup.Ct. (Barr)* (1978) 82 Cal.App. 3d 72, 86.  
 9

10 **B. THE STATUTES GOVERNING DISQUALIFICATION FOR CAUSE IN**  
 11 **CALIFORNIA ARE INTENDED TO ENSURE PUBLIC CONFIDENCE IN THE**  
 12 **JUDICIARY AND TO PROTECT THE RIGHTS OF LITIGANTS TO A FAIR AND**  
 13 **IMPARTIAL ADJUDICATOR AND THE UNITED STATES SUPREME COURT HAS**  
 14 **STATED THAT A FAIR TRIAL IN A FAIR TRIBUNAL IS A BASIC REQUIREMENT OF**  
 15 **DUE PROCESS**  
 16

17 The conduct exhibited by Judge Steve Kim showed clear evidence of bias and prejudice and  
 18 deprived Amber Doe of their right to a fair and impartial adjudicator. This conduct also deprived him  
 19 of his right to a fair trial in a fair tribunal which is a basic requirement of due process as stated by the  
 20 United States Supreme Court.  
 21

22 The California Supreme Court has stated that the, "Statutes governing disqualification for  
 23 cause are intended to ensure public confidence in the judiciary and to protect the right of the litigants  
 24 to a fair and impartial adjudicator." *Curle v. Superior Court* (2001) 24 Cal.4th 1057, 1070.  
 25

26 The United States Supreme Court has stated that, it is "axiomatic that [a] fair trial in a fair  
 27 tribunal is a basic requirement of due process." *Caperton v. A. T. Massey Coal Company*, (2009)  
 28

1 556 U.S. 868, 876. In *Caperton* the Supreme Court also stated that the due process clause of the  
 2 federal Constitution (US Const amend XIV) can require judicial disqualification even in cases where  
 3 the party requesting disqualification has not complied with any applicable state disqualification  
 4 statutes, and that a showing of actual bias is not required for judicial disqualification under the due  
 5 process clause.  
 6

7 “The Due Process Clause entitles a person to an impartial and disinterested tribunal...”  
 8  
 9 *Marshall v. Jerrico, Inc.* (1980) 446 U.S. 238, 242; see also *Brown v. American Bicycle Group, LLC*,  
 10 (2004) 224 Cal.App.4th 665, 674.

11 The well-established common law rule is that recusal is required when a judge has a direct,  
 12 personal, substantial, or pecuniary interest in a case. *Caperton v. A.T. Massey Coal Co.*, supra, 556  
 13 U.S. at p. 876-77; see also *Aetna Life Ins. Co. v. Lavoie*, (1986) 475 U.S. 813, 820.  
 14

15 Judges have a duty to make their decisions free from any bias or prejudice. *Cal Rules of Ct*,  
 16 Standards of J Admin 10.20; *Cal Rules of Ct*, *Code of Judicial Ethics*, Canon 3B(5).  
 17

18 “(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the  
 19 performance of judicial duties, engage in speech, gestures, or other conduct that would reasonably be  
 20 perceived as (1) bias or prejudice, including but not limited to bias or prejudice based upon race, sex,  
 21 gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status,  
 22 socioeconomic status, or political affiliation, or (2) sexual harassment. “  
 23

24 Judge also have a duty to require lawyers in proceedings before them to refrain from  
 25 manifesting any bias or prejudice. *Code of Judicial Ethics*, Canon 3B(6).  
 26

27 “(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting,  
 28 by words or conduct, bias or prejudice based upon race, sex, gender, religion, national origin,

1 ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political  
2 affiliation against parties, witnesses, counsel, or others.”

3 Judges have a duty to allow every party to a legal proceeding the full right to be heard  
4 according to law. *Code of Judicial Ethics*, Canon 3B(7).

6 “(7) A judge shall accord to every person who has a legal interest in a proceeding, or that  
7 person’s lawyer, full right to be heard according to law.”

10 **C. Amber Doe HAS SHOWN COMPELLING EVIDENCE IN SUPPORT OF her**  
11 **OBJECTION see court record Pacer and Complaint no filing has been served on Amber Doe**  
12 **by defendants in the instant case yet they have procured multiple signatures from Hon. Steve**  
13 **Kim on their pleading that they have not served Plaintiff nor have they provided her the signed**  
14 **copies and she has no access to a credit card as Quinn Emanuel tampered with Amber Does**  
15 **banks and demanded they remove her access to all credit products inclusive of credit cards so**  
16 **she has no ability to pay for downloads from Pacer or the Orange County Court website in the**  
17 **court where the Judges are allowing proceedings to move forward against Amber Doe with no**  
18 **regard for the fact that the lawyers are conspiring together to obtain \$ 100 million dollars for**  
19 **no reason while Amber Doe suffers debilitating medical conditions caused by defendants abuse**  
20 **and has no shelter because of defendants abuse and continues to be stalked by multiple men**  
21 **that she does not know. Amber Doe has no ability to download more than the limited \$30 per**  
22 **quarter in documents from pacer.**

26 **In furtherance of the aforementioned The Judges/Justices are aware that the illegally procured**  
27 **“gag order” and the Illegal selling of the case to cover Up the crimes committed against**  
28

1 **Plaintiff do not extend to the Courts in Canada, England ,France, Japan, Puerto Rico, The**  
2 **Virgin Islands, China or any other country where Amber Doe was trafficked and must file cases**  
3 **against defendants so that she can finally gain her freedom and obtain Medical treatment,**  
4 **Food, Shelter, Safety and Peace.**

7 **THUS DISQUALIFICATION IS REQUIRED IN THE INTERESTS OF JUSTICE**

8 **III.NOTICE OF MOTION AND MOTION TO ALL PARTIES AND THEIR**

9 **ATTORNEYS OF RECORD: PLEASE TAKE NOTICE that on April 26, 2019, at 9:30 a.m., or**  
10 **as soon thereafter as may be heard before the Honorable Maame Ewusi-Mensah Frimpong**

11 **District Judge**

12 **United States Courthouse, 350 West First Street, Los Angeles, CA, 90012, Courtroom 8B, 8th**  
13 **Floor**

14 **of the United States District Court for the Southern District of California, Western Division**

15 **Los Angeles will and hereby do move this Court for an order disqualifying Quinn Emanuel**

16 **Urquhart & Sullivan, LLP (“Quinn Emanuel”), from representing Michael Lewis Goguen,**

17 **Sequoia Capital, Two Bear Capital, Any and all companies owned By Michael Lewis Goguen ad**

18 **Sequoia Capital, They must not be allowed to represent any defendant in the instant case as**

19 **they have a self serving reason to do so in furtherance of obstruction of justice The must be**

20 **barred from repressing , Inc. (“SCI”), in this action. Uber respectfully requests that the Court**

21 **disqualify Quinn Emanuel lawyers from representing QUINN EMANUEL URQUHART &**

22 **SULLIVAN LLP . They have a monopoly on the legal profession and act at all times in regards too**

1 Plaintiff Amber Doe with SUPREME and Absolute Malice. These criminal Quinn Emanuel lawyers  
 2 must forever be barred from interfering on any way with Amber Doe's medical treatment.  
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 6

7 **Quinn Emanuel's Representation Of Michael Lewis Goguen His companies, QUINN**  
 8 **EMANUEL URQUHART & SULLIVAN LLP their relationships and marriages to Judges**  
 9 **Their monopoly of the legal field their vested interest in the outcome of the case as they are**  
 10 **both defendants and witnesses in the instant case all of their violations of the law over the**  
 11 **course of the last 9 years in multiples states countries costs and jurisdictions relating to the**  
 12 **Matter Compels Their Disqualification.**

13 **Quinn Emanuel lawyers were deeply involved in every aspect of the litigation matters They are**  
 14 **guilty on all counts and allegations set forth in the complaint in the instant case. The Conflict**  
 15 **Of Interest Of Certain Attorneys At Quinn Emanuel Is Imputed Directly To The Entire Firm.**  
 16 **No Discretionary Or Equitable Reason Weighs Against Disqualifying Quinn Emanuel.**

#### 17 **Rules California Rule of Professional Conduct**

18 **LEGAL STANDARD "The right to disqualify counsel is a discretionary exercise of the trial**  
 19 **court's inherent powers." Epikhin v. Game Insight N. Am., No. 14-CV-04383-LHK, 2015 WL**  
 20 **2229225, at \*3 (N.D. Cal. May 12, 2015) (citation omitted). Civil Local Rule 11-4(a)(1) mandates**  
 21 **that every attorney who appears before this Court "comply with the standards of professional**  
 22 **conduct required of members of the State Bar of California." Accordingly, this Court looks to**  
 23 **California law to determine whether counsel should be disqualified. Sunbeam Prods. Inc. v.**  
 24 **Oliso, Inc., No. C 13-03577 SI, 2014 WL 892918, at \*1 (N.D. Cal. Mar. 4, 2014). Under**  
 25 **California law, an attorney owes her client a duty of loyalty and a duty of confidentiality. Id. at**  
 26 **\*3. While courts are hesitant to interfere with a client's right to counsel of its choice, the**  
 27 **Supreme Court of California has underscored that "[t]he important right to counsel of one's**  
 28 **choice must yield to ethical considerations that affect the fundamental principles of our judicial**  
**process" and "[t]he paramount concern must be to preserve public trust in the scrupulous**  
**administration of justice and the integrity of the bar." Speedee Oil, 20 Cal. 4th at 1145. "It is**  
**beyond dispute [that] a court may disqualify an attorney from representing a client with**  
**interests adverse to those of a former client." H.F. Ahmanson & Co. v. Salomon Bros., Inc., 229**  
**Cal. App. 3d 1445, 1451 (Ct. App. 1991) (citations omitted). "Disqualification in cases of**  
**successive representation," as here, "is based on the prohibition against employment adverse to**  
**a former client where, by reason of the representation of the former client, the attorney has**

obtained confidential information material to the employment.” Id. (quotation marks, brackets, and ellipses omitted); see Cal. R. Prof. Conduct 1.9 (“A lawyer who has formerly represented a client in a matter shall not thereafter represent another person in . . . a substantially related matter in which that person’s interests are materially adverse to the interests of the former client . . .”). Disqualification is automatic if the former client does not consent, and “[t]he court does not engage in a ‘balancing of equities’ between the former and current clients.” H.F. Ahmanson, 229 Cal. App. 3d at 1451. “The rights and interests of the former client will prevail.” Id. “If there is a reasonable probability that confidences were disclosed which could be used against the client in later, adverse representation, a substantial relation between the two cases is presumed,” and disqualification is warranted. *Trone v. Smith*, 621 F.2d 994, 998 (9th Cir. 1980) (emphases added). Of course, actual possession of the former client’s confidential information is sufficient to warrant disqualification, but establishing actual possession is not required because “it is not within the power of the former client to prove what is in the mind of the attorney.” Id. at 1453 (quoting *Global Van Lines, Inc. v. Super. Ct. of Orange Cnty.*, 144 Cal. App. 3d 483, 489 (Ct. App. 1983)). Rather, all that is necessary is that “a substantial relationship has been shown to exist between the former representation and the current representation.” Id. at 1454 (quoting *Johnson v. Superior Court*, 159 Cal. App. 3d 573, 578 (Ct. App. 1984)). Whether the facts or legal questions are similar depend on whether they are “material.” *Jessen v. Hartford Cas. Ins. Co.*, 111 Cal App. 4th Case 3:18-cv-07440-JCS Document 30 Filed 02/15/19 Page 15 of 30 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 11 DEFENDANTS’ MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP – CASE NO. 3:18-CV-07440-JCS Gibson, Dunn & Crutcher LLP 698, 713 (Ct. App. 2003). For information to be material, “it must be found to be directly at issue in, or have some critical importance to, the second representation.” *Farris v. Fireman’s Fund Ins. Co.*, 119 Cal. App. 4th 671, 680 (Ct. App. 2004) (emphasis added). The presumption that an attorney has access to privileged and confidential matters relevant to a subsequent representation extends the attorney’s disqualification vicariously to the attorney’s entire firm. *Speedee Oil*, 20 Cal. 4th at 1146; see also *Trone*, 621 F.2d at 999 (“Once the attorney is found to be disqualified, both the attorney and the attorney’s firm are disqualified from suing the former client.”); *Employers Ins. of Wausau v. Albert D. Seeno Const. Co.*, 692 F. Supp. 1150, 1164 (N.D. Cal. 1988) (“[B]ecause as a rule an attorney is presumed to have the same knowledge and ethical relationships as all the other attorneys in his firm, if one attorney in a firm is disqualified from a representation, all the attorneys in the firm are.”); *Flatt*, 9 Cal. 4th at 283 (“If a substantial relationship is established, the discussion should ordinarily end. The rights and interest of the former client will prevail. Conflict would be presumed; disqualification will be ordered.”) (citation omitted).

### Argument

1       **There are no facts to dispute Quinn Emanuel is guilty on all counts in the complaint their are**  
2               **guilty of Obstruction of Justice criminal mis conduct and must Be disqualified from**  
3       **representing any party in the Instant case so that Amber Doe can have a fair trial and attempt**  
4               **to gain her freedom and save her life.**  
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19                               **CONCLUSION**

20       **Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), Must be disqualified from the**  
21       **instant case as they are Guilty on all counts as evidenced in the court records in all cases where**  
22               **Plaintiff Amber Doe is either a Plaintiff or Defendant. In the Name of Justice they must be**  
23       **Disqualified From representing any defendant in the instant case.**  
24  
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**DECLARATION OF Amber Doe**



1 I, Amber Doe declare as follows:

2 1. I am a party to this action and am over the age of 18 years. I have  
3 personal firsthand knowledge of the facts set forth herein and if called as a witness could and would  
4 testify competently to the truth of the facts set forth herein.  
5

6 2. I make this declaration in support of my objection to the Hon. Steve Kim presiding at  
7 any further proceedings in this action.  
8

9 3. QUINN EMANUEL URQUHART & SULLIVAN LLP is disqualified to representing  
10 Michael Lewis Goguen His Companies, the witnesses in the instant case or representing QUINN  
11 EMANUEL URQUHART & SULLIVAN LLP THE “Lawyers” or former lawyers of the firm from  
12 proceedings in this action on the grounds that: This case was filed March 28th 2023. for human  
13 trafficking, rape, premises liabilities and 241 additional causes of action and violations of the law  
14  
15 I have declared under penalty of perjury that I can not afford to pay for filing fees in the instant case  
16 or the the filing fees in the several other cases where my situation of human trafficking is being  
17 exploited for profit by dozens if not hundreds of lawyers from the largest law firms in the United  
18 States. The Court is aware that plaintiff has to represent herself against all of these powerful  
19 defendants has no law degree and is in dire need of medical treatment which has been removed from  
20 her by the absolute abuse of legal process, obstruction of justice and Abuse she has endured. She is  
21 denied Legal Aid And public Counsel because she is forced to sue lawyers in attempt to gain her  
22 freedom.  
23

24 In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His  
25 lawyers Quinn Emanuel They have filed multiple motions and pleadings in the instant case and  
26  
27  
28

1 refused to serve a single pleading or notice to Amber Doe although she makes several demands for  
2 service of the pleadings per week.

3 Amber Has told all of the Courts that she is not Being served legal pleadings discovery motions or  
4 anything related to at least tree cases where she is either the plaintiff or defendant.  
5

6  
7 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the  
8 Lawyers in this case since Feb 2014. It is Now August 2023.  
9

10  
11 It is in evidence that plaintiff has been deprived of her human rights civil rights constitutional rights  
12 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
13 humanity.  
14

15 Goguen has solicited Plaintiffs murder on multiple occasions that is in evidence.  
16

17  
18 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer  
19 the entire constitution of the untied states would be come invalid if this abuse of process continues.  
20 The Constitution extends to all humans not only the rich and the guilty and for those who the court  
21 feels deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or  
22 not.  
23

24  
25 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form  
26 of a restraining order when plaintiff is the one who was raped, trafficked and being stalked. Plaintiff  
27 has never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
28

1 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
2 it was procured through fraudulent inducement of a judge and bribery Such gag order was signed first  
3 by Hon. Danny Chao after he was bribed. The Second Order signed By Hon. Elizabeth Lee after  
4 Quinn Emanuel Lawyers again acted with Malice and Served plaintiff only the pleadings they felt  
5 like serving plaintiff and intentionally obstructed the Judicial process by Suddenly changing the date  
6



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18 of the hearing and in addition providing Plaintiff with a fake Hearing time of 1:00 pm when they  
19 knew the hearing was set for 9:00 am and they did not provide payoff of the court room nor the  
20 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or  
21 defend herself.  
22

23  
24  
25  
26 The court exerts that Plaintiff made Ex-parte Communications to the Court which lawyers and  
27 People without lawyers are allowed and instructed to email the clerk and the clerks email them in  
28

1 response. Plaintiff never spoke to the Judge nor did she bribe the judge she followed the instructed  
2 protocol. The Clerks in the office instructed Amber Doe to email the Clerk and speak to the Deputy  
3 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
4 Judgement heard Before the Judge. Again If defendant Michael Lewis Goguen and His lawyers did  
5 not force Amber Doe to fire her lawyer and subsequently bribe and conspire with her former lawyers  
6 plaintiff would not be representing herself in all of this litigation.  
7  
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10

11 4. A true and correct copy of the court record is available on pacer and in the courts system  
12 Amber has suffered Greatly at the abuse of process by MOTION TO DISQUALIFY QUINN  
13 EMANUEL URQUHART & SULLIVAN LLP. In order For Amber Doe to Have for Access to the  
14 legal Systems MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP  
15 Must be disqualified from the instant case. They are Defendants involved in the malicious conspiracy  
16 they are married to Judges and other lawyers and they have acting with SUPREME AND  
17 ABSOLUTE MALICE. They are Participants in the malicious conspiracy and Have Dehumanized  
18 Amber Doe in every possible way so that they can Profit from her circumstances of Slavery, Rape  
19 Abuse, Mutilation see the 244 causes of action and Violations of the law.  
20  
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22  
23

24 5. Quinn Emanuel are still obstructing Justice when they know they are guilty of Legal  
25 Mis conduct conspiracy stalking and many of the 244 or more Causes of action and Violations of the  
26 law in the instant case.  
27  
28

1 A new Judge in the Federal court that will not prejudice and stigmatize plaintiff and allow the  
 2 defendant and his army of lawyers to continue to obstruct the civil and criminal judicial process must  
 3 be appointed. This disqualification must take place in the name of fair access to the courts by all and  
 4 to prevent further violations of my human rights, constitutional rights and civil rights. I and am  
 5 presenting this verified statement at the earliest possible opportunity.

7 **6. The Court record speaks for itself**

8 **MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP** knows or  
 9 reasonably should know that the list of defendants included defendants in international countries and  
 10 hundreds of defendants in the United States and Canada so there is no possible way for the instant  
 11 case to be a secret and have some how had the instant case sealed with no reason to do so as all  
 12 defendants and plaintiffs have the right to read review and cross-examine the defendants and  
 13 plaintiffs on the evidence. Defendants Michael Lewis Goguens requests for the Judges and the  
 14 government to cover up his sex trafficking conspiracy are an obstruction of justice and a slap in the  
 15 face to his victims of which there are a great many. Quinn And Emanuel Must be disqualified from  
 16 the instant case so that Plaintiff can proceed to trial have a fair trial and become a free persona who  
 17 has food shelter medical care and sis no longer trafficked by anyone. Plaintiff is not suing the Judges.

21 I declare under penalty of perjury under the laws of the State of California that the foregoing  
 22 is true and correct and that this declaration is executed on August 24, 2023 at Los Angeles,  
 23 California.

25 I, Amber Doe declare that:

27 I am a party to this action.

1 My testimony and all attachments and contents thereof. I declare that the same is true of my  
2 own knowledge, except as to those matters which are therein stated upon my information and belief,  
3 and to those matters I believe them to be true.  
4

5 I declare under penalty of perjury under the laws of the State of California, that the foregoing  
6 is true and correct.  
7

8  
9  
10 Executed this 24th day of August, 2023, at

*Amber Doe*  
Los Angeles , California.



The unanimous Declaration of the thirteen united States of America.

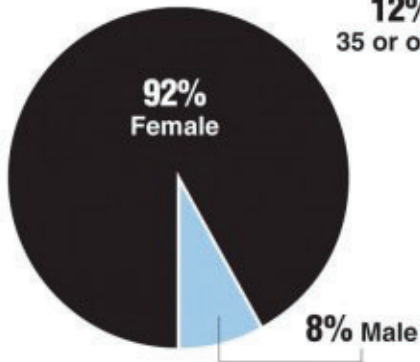
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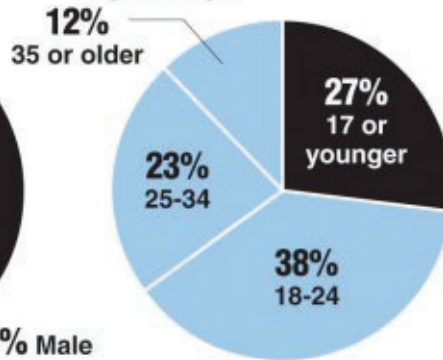
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# Who are the victims of human trafficking?

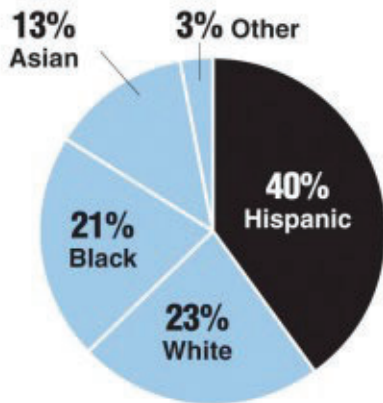
## Gender



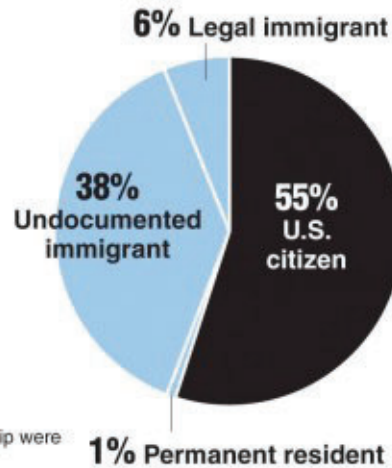
## Age range



## Ethnic origins



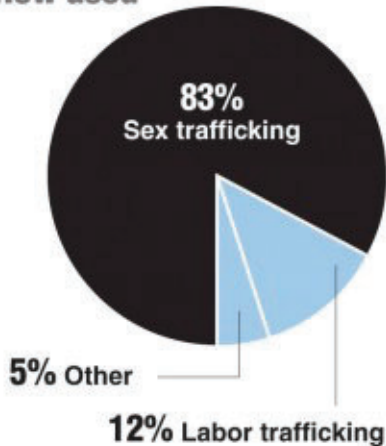
## Citizenship



NOTE: Data for age, ethnic origins and citizenship were not reported for about half the reported victims

## The work of slavery

### How used



### Sex trafficking

#### Forced prostitution



#### Child sex trafficking



#### Other



© 2009 MCT

Source: Characteristics of Suspected Human Trafficking Incidents, 2007-08, U.S. Bureau of Justice Statistics, January 2009  
Graphic: Dave Eames and Mark Morris, The Kansas City Star



1  
2  
3 Charts showing the victims of human trafficking in the U.S., by gender,  
4 age, ethnic origin; includes information on how victims are used.  
(Graphic Credit: MCT Campus, The Kansas City Star, 2009)

5 [Lauren J. Mapp](#), Editor-in-Chief

6 November 5, 2012

7 Marie (not her real name) was a 15-year-old girl like many others – she  
8 was a soccer player who worked hard in her classes and had dreams of  
9 going to college to become a nurse. Unlike many students, though, she  
10 had a secret.

11 At home Marie’s stepfather abused her on a regular basis, and after  
12 several years of sexual and physical trauma she became too afraid to  
13 stand up to him. Her solution was to run away from her family’s home  
in Eastlake.

14 “I couldn’t tell my mother because I knew it was gonna break her heart,  
15 and I was embarrassed to talk to anyone at school about it,” Marie said.  
16 “I got up and left and thought that I’d finally be safe.”

17 Instead of the safety she thought she was running away to, Marie instead  
18 found herself alone and hungry on the streets in downtown San Diego,  
19 wondering where she would turn next. When Bruce (also a pseudonym)  
20 asked her out to dinner, offering to pay, she gladly accepted. She and the  
21 32-year-old immediately started dating, but within a few short weeks he  
revealed his plan to her for how they could make some quick cash:  
22 prostitution.

23 Having no other options, she reluctantly decided to go along with his  
24 idea, but Marie soon realized that the emotional turmoil would be more  
than she could bear.

25 “The first time was the hardest,” Marie said. “I kept thinking that it was  
26 wrong. This man was dirty, sweating, groping me, focused on getting  
27 laid and nothing else. I went back to Bruce’s apartment and cried myself  
28

1 to sleep, saying I wouldn't do it again, but the next night I was back on  
2 the street."

3 America's Finest City is the eighth most prominent U.S. metro area for  
4 sex trafficking, according to the FBI (Los Angeles and San Francisco are  
5 also in the top 13). It is estimated that as many as 2,500 teenage  
6 runaways are in San Diego at any given time, and that most runaway  
7 children are approached for sex within 48 hours of being on their own,  
8 according to Generate Hope's Director of Development Holly Hepburn.  
9 Since 2010, Generate Hope – a San Diego non-profit organization – has  
10 been working with women ages 18 to 35 who are victims of sex  
11 trafficking, helping them break free from trafficking and reestablish  
12 themselves in mainstream society. Although Generate Hope helps  
13 victims from all areas, the majority are from San Diego County.  
14 "It's very much happening in our cities and in our schools," Hepburn  
15 said about sex trafficking-related crimes.

16 Eric Drilling, a vice detective in the San Diego Police Department, said  
17 the average age for entering into prostitution is 12 to 13. He said that  
18 most local victims of sex trafficking are from the San Diego area.  
19 Drilling said people might see girls working on streets known for  
20 prostitutes, such as El Cajon Boulevard, and think they are there freely,  
21 but that this is often a misconception.

22 "A vast majority of these girls have pimps, and it may appear that  
23 they're willing to do this, but there's a lot of psychological coercion that  
24 goes into pimping," Drilling said.

25 The Californians Against Sexual Exploitation Act, also known as  
26 Proposition 35, is an initiative to fight sex trafficking in California, will  
27 be on the ballot Tuesday. If passed, the so-called CASE Act would  
28 increase Megan's Law protections against online predators, increase  
prison terms for those convicted of sex trafficking and require that law  
enforcement agents have sufficient training on human trafficking.

1 The CASE Act would also create fines for convicted criminals. Funds  
2 raised from the fines would be used in services to help sex trafficking  
3 victims.

4 “I think it’s a good starting point because you’ve got to start  
5 somewhere,” Hepburn said about the CASE Act. “It’s a tough subject  
6 [and] it’s going to be tough to get [the law] passed. People are just  
7 starting to learn about it.”

8 Drilling believes changes in the law such as Prop 35 and increased  
9 funding for law enforcement are key to fighting sex trafficking.

10 “I’m a cop. I’m always going to advocate for more money,” he said.

11 “We could double the size of this [vice] unit, and it just means that many  
12 more girls off the street and that many more pimps in jail. Sentencing is  
13 something that certainly assists us with the goal of locking away people  
14 that engage in this activity.”

15 Marie finally got away from Bruce and selling her body, yet many more  
16 victims of sex trafficking remain in San Diego. Today, Marie has  
17 escaped from both the trauma of her abusive upbringing and the abusive  
18 lifestyle of working for Bruce, but many children are still trapped within  
19 abusive relationships

20 “I wish that there were options for me when I was being abused by my  
21 stepdad,” Marie said. “Other kids [shouldn’t have to] sell their bodies  
22 like I did at that age, and I hope that things change so girls can escape  
23 from [sex] trafficking easier.”  
24  
25  
26  
27  
28

1  
2 Trafficking victims are deceived by false promises of  
3 love, a good job, or a stable life and are lured or forced  
4 into situations where they are made to work under  
5 deplorable conditions with little or no pay. In the United  
6 States, trafficking victims can be American or foreign  
7 citizens. Sep 28, 2022  
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1 **Amber Doe** HEREBY OBJECTS to the Presiding Judge Maame Frimpong and Hon. **Judge Steve**  
2 **Kim** presiding at any further hearings or proceedings concerning this action. Said objection is based  
3 on the grounds and upon the facts set forth in this motion.  
4

5 People in positions of power have the ability to use it for good or evil and I see a lot  
6 of evil here.

7 To be oppressed is to be exploited or systematically harmed by  
8 others. People who have no freedom are oppressed. Being  
9 oppressed is a negative and unfair condition. The United States was  
10 founded because we felt oppressed by the rule of England.  
11

12  
13 noun. the exercise of authority or power in a burdensome, cruel, or  
14 unjust manner. an act or instance of oppressing or subjecting to cruel  
15 or unjust impositions or restraints.  
16

## 17 18 19 **Oppression**

- 20 • Exploitation. Refers to the act of using people's labors to  
21 produce profit, while not compensating them fairly. ...
- 22 • Marginalization. ...
- 23 • Powerlessness. ...
- 24 • Cultural Imperialism. ...
- 25 • Violence.
- 26
- 27
- 28

1  
2  
3  
4  
5 1. I am a party to this action and am over the age of 18 years. I have personal firsthand  
6 knowledge of the facts set forth herein and if called as a witness could and would testify competently  
7 to the truth of the facts set forth herein.

8  
9 2. I bring this motion because in objection to the Hon. Steve Kim presiding at any further  
10 proceedings in this action.

11 3. The Hon. Maame Frimpong and Hon. Steve Kim is disqualified to preside at any further  
12 proceedings in this action on the grounds that: This case was filed June 19th 2023. Within 5 days of  
13 the date of filing the complaint for  
14

15 1. Human Trafficking

16 Bad Faith 2. Conspiracy 3. Obstruction of Justice 4. Personal Injury 5. Fraud 6. Attorney Interference

17 7. Stalking 8. Violation of the Trafficking Victims Protection Act 9. Racketeering 10. Civil Theft

18 11. Wrongful Death 12. Deceit 13. INTENTIONAL INTERFERENCE WITH ECONOMIC

19 RELATIONS 14. Unjust enrichment 15. Malicious Prosecution 16. INTERFERENCE WITH

20 EXISTING CONTRACT- NEGLIGENT 17. INTERFERENCE WITH EXISTING CONTRACT-

21 INTENTIONAL 18. MONEY HAD AND RECEIVED 19. WILLFUL MISCONDUCT 20. UNFAIR

22 COMPETITION VIOLATION OF PUBLIC POLICY 21. BREACH OF PRIVACY 22. Intentional

23 infliction of emotional distress 23. PROFESSIONAL NEGLIGENCE 24. Violation of Victims of

24 Crime Act 25. Violation of Marcys law 26. Violation of Ambers Law 27. Defamation 28. Violation of

25 Megans Law 29. Violation of Jessies law 30. Violation of Jessicas Law 31. Violation of Chelseas Law  
26  
27  
28

1 32. Unlawful Endangerment 33. Violation of the Bane act 34. Violation of the Ralph act 35. GROSS  
 2 NEGLIGENCE 36. Tortious Interference 37. Trespass to chattels 38. Conversion 39. Violation of the  
 3 Ku Klux Klan act 40. Violation of the Mann Act 41. Violation of the Human Rights Act 42. Violation  
 4 of The California Constitution 43. Invasion Of Privacy 44. False Light 45. Inciting Gender Violence  
 5  
 6 46. Legal Misconduct

7 47. Negligent Supervision of Diane Doolittle and not reporting Diane Doolittle who has bribed  
 8 people at the state bar to not bring her before state bar court.

9  
 10 For everyones convenience here are the rules of the state bar.

11 Rule 8.3 Reporting Professional Misconduct (Rule Approved by the Supreme Court, Effective August 1, 2023) (a) A  
 12 lawyer shall, without undue delay, inform the State Bar, or a tribunal\* with jurisdiction to investigate or act upon such  
 13 misconduct, when the lawyer knows\* of credible evidence that another lawyer has committed a criminal act or has  
 14 engaged in conduct involving dishonesty, fraud,\* deceit, or reckless or intentional misrepresentation or misappropriation  
 15 of funds or property that raises a substantial\* question as to that lawyer's honesty, trustworthiness, or fitness as a lawyer  
 16 in other respects. (b) Except as required by paragraph (a), a lawyer may, but is not required to, report to the State Bar a  
 17 violation of these Rules or the State Bar Act. (c) For purposes of this rule, "criminal act" as used in paragraph (a) excludes  
 18 conduct that would be a criminal act in another state, United States territory, or foreign jurisdiction, but would not be a  
 19 criminal act in California. (d) This rule does not require or authorize disclosure of information gained by a lawyer while  
 20 participating in a substance use or mental health program, or require disclosure of information protected by Business and  
 21 Professions Code section 6068, subdivision (e) and rules 1.6 and 1.8.2; mediation confidentiality; the lawyer  
 22 client privilege; other applicable privileges; or by other rules or laws, including information that is confidential under  
 23 Business and Professions Code section 6234. Comment [1] This rule does not abrogate a lawyer's obligations to report  
 24 the lawyer's own conduct as required by these rules or the State Bar Act. (See, e.g., rule 8.4.1(d) and (e); Bus. & Prof.  
 25 Code, § 6068, subd. (o).) [2] The duty to report under paragraph (a) is not intended to **discourage** lawyers from  
 26 seeking counsel. This rule does not apply to a lawyer who is consulted about or retained to represent a lawyer whose  
 27 conduct is in question, or to a lawyer consulted in a professional capacity by another lawyer on whether the inquiring  
 28 lawyer has a duty to report a third-party lawyer under this rule. The duty to report under paragraph (a) does not apply if  
 the report would involve disclosure of information that is gained by a lawyer while participating as a member of a state or



1 local bar association ethics hotline or similar service. [3] The duty to report without undue delay under paragraph (a)  
 2 requires the lawyer to report as soon as the lawyer reasonably believes\* the reporting will not cause material prejudice or  
 3 damage to the interests of a client of the lawyer or a client of the lawyer's firm.\* The lawyer should also consider the  
 4 applicability of other rules such as rules 1.4 (the duty to communicate), 1.7(b) (material limitation conflict), 5.1  
 5 (responsibilities of managerial and supervisory lawyers), and 5.2 (responsibilities of a subordinate lawyer). 2 [4] This  
 6 rule limits the reporting obligation to those offenses that a self-regulating profession must vigorously endeavor to prevent.  
 7 A measure of judgment is, therefore, required in complying with the provisions of this rule. The term "substantial"  
 8 question" refers to the seriousness of the possible offense and not the quantum of evidence of which the lawyer is aware.  
 9 [5] Information about a lawyer's misconduct or fitness may be received by a lawyer while participating in a substance use  
 10 or mental health program, including but not limited to the Attorney Diversion and Assistance Program. (See Bus. & Prof.  
 11 Code, § 6234.) In these circumstances, providing for an exception to the reporting requirement of paragraph (a) of this  
 12 rule encourages lawyers to seek treatment through such programs. Conversely, without such an exception, lawyers may  
 13 hesitate to seek assistance from these programs, which may then result in additional harm to their professional careers and  
 14 additional injury to the welfare of clients and the public. [6] The rule permits reporting to either the State Bar or to "a  
 15 tribunal\* with jurisdiction to investigate or act upon such misconduct." A determination whether to report to a tribunal,\*  
 16 instead of the State Bar, will depend on whether the misconduct arises during pending litigation and whether the  
 17 particular tribunal\* has the power to "investigate or act upon" the alleged misconduct. Where the litigation is pending  
 18 before a non-judicial tribunal,\* such as a private arbitrator, reporting to the tribunal\* may not be sufficient. If the  
 19 tribunal\* is a proper reporting venue, evidence of lawyer misconduct adduced during those proceedings may be  
 20 admissible evidence in subsequent disciplinary proceedings. (Caldwell v. State Bar (1975) 13 Cal.3d 488, 497.)  
 21 Furthermore, a report to the proper tribunal\* may also trigger obligations for the tribunal\* to report the misconduct to the  
 22 State Bar or to take other "appropriate corrective action." (See Bus. & Prof. Code, §§ 6049.1, 6086.7, 6068.8; and Cal.  
 23 Code of Jud. Ethics, canon 3D(2).) [7] A report under this rule to a tribunal\* concerning another lawyer's criminal act or  
 24 fraud\* may constitute a "reasonable\* remedial measure" within the meaning of rule 3.3(b). [8] In addition to reporting as  
 25 required by paragraph (a), a report may also be made to another appropriate agency. A lawyer must not threaten to present  
 26 criminal, administrative or disciplinary charges to obtain an advantage in a civil dispute in violation of rule 3.10. [9] A  
 27 lawyer may also be disciplined for participating in an agreement that precludes the reporting of a violation of the rules.  
 28 (See rule 5.6(b); and Bus. & Prof. Code, § 6090.5.) [10] Communications to the State Bar relating to lawyer misconduct  
 are "privileged, and no lawsuit predicated thereon may be instituted against any person." (Bus. & Prof. Code, § 6094.)  
 However, lawyers may be subject to criminal penalties for false and malicious reports or complaints filed with the State

1 Bar or be subject to discipline or other penalties by offering false statements or false evidence to a tribunal.\* (See rule  
2 3.3(a); Bus. & Prof.

3  
4 Cause of action 48. INTERFERENCE WITH MEDICAL TREATMENT  
5

6  
7 I have not filed this case as a deprivation of rights case. Evidently I have a deprivation of rights case  
8 because Judge Maame Frimpong and Judge Steve Kim keep converting my Discovery case over to a  
9 194 case and demanding it be assigned to them with zero legal basis to request my case be assigned  
10 to them.

11  
12 My case should not be assigned to them under any circumstances. I have repeatedly made it clear  
13 that through my motions and letters to the clerk of court that they are not mentally fit to preside over  
14 my case due to corruption and their prejudice that the “salacious” Nature of my child sex trafficking  
15 which is now a conspiracy to cause my death in the streets of Los Angeles and via being deprived of  
16 all medical treatment that could save my life.  
17

18 These judges have no more right to demand my case be assigned to them that I have to simply select  
19 the judge I would like best to preside over my case. Judges must adhere to rules and the law as well.  
20

21  
22 My fee waiver should have been granted as I have declared under penalty of perjury that I can not  
23 afford to pay for filing fees in the instant case or the the filing fees in the several other cases where  
24 my situation of human trafficking is being exploited for profit by dozens if not hundreds of lawyers  
25 from the largest law firms in the United States. The fee waiver still has never been granted by Hon.  
26 Steve Kim. Nor Hon Maame Frimpong who evidently are intent on depriving plaintiff of her right to  
27 life while acting under the color of the law. I have no money to pay court fees at this time. I have no  
28

1 money to pay costs costs and fees. I have no income, no assets, no home, and no ability to pay for  
2 medical treatment, food, basic life necessities, ie. medication, menstrual products, vitamins,  
3 transportation or any other expenses. All of the aforementioned facts are due to the lawyers  
4 negligence willful misconduct, fraud ,malice, civil theft, legal malpractice ,conspiracy and my  
5 circumstances of being a victim of human trafficking since I was 15 years old.  
6

7 I have not yet been emancipated and seek all possible relief from this court so that I can seek  
8 shelter ,food , medical treatment and safety.  
9

10  
11 The lawyers did not do their Jobs as my lawyers and stole the funds from my attorney client trust  
12 account and never went to trial leaving me with zero recovery for my damages and zero money in my  
13 attorney client trust account. I am a victim of human trafficking ,modern day slavery and sex crime.  
14

15 I had to move into the women's shelter because I can no longer pay for an apartment nor can I work  
16 because I am extremely ill do to the damage sustained in the case the lawyers were negligent in  
17 representing me in.  
18

19  
20 I am sorry I can not afford to pay the filing fees. I do not receive any state benefits nor am I asking  
21 for any. I can only eat food that people share with me from the goodness of their hearts because prior  
22 to all of these events I did a lot of volunteer work.  
23

24  
25 I ask that the court kindly grant my fee waiver which is fair and applicable under the laws of The  
26 California and the United States of America and I can serve my summons file motions pleadings and  
27 at the soonest possible time I can pay back the court for my fees in full. I am an indigent filer because  
28

1 of the legal malpractice in which I am suing for. If I could pay the filing fees I would gladly do so. I  
2 ask the court to kindly grant my fee waiver.  
3  
4

5 Plaintiff no longer believes that Judge Frimpong and Judge Kim are capable of not violating  
6 plaintiffs constitutional rights to a fair trial on the merits of any of the cases against any of the  
7 defendants that have harmed her and robbed her of all of her life freedom and liberties after they  
8 discovery she has been a victim of human trafficking since the age of fifteen.  
9

10  
11 Judges Maame Frimpong and Judge Steve Kim are intentionally depriving plaintiff of her right to a  
12 trial in any and all jurisdictions while acting under the color of the law.  
13  
14

15 Plaintiff was granted her fee waiver and the summons were ordered to be issued by Chief Judge  
16 Lawyer Taylor Swain in the Southern district of New York where many of the defendants and or their  
17 businesses are located so it is also a proper jurisdiction for my trial. Diane Doolittle the same lawyer  
18 who bribed judges, bribed the the referee from JAMS Read Ambler and paid a judge in Canada to to  
19 participate in her conspiracy to obstruct justice globally and exploit my circumstances of child sex  
20 trafficking Doolittle sent a Fedex to Chief Judge Laura Taylor Swain requesting the deprivation of  
21 my right to a trial by Jury In New York state, subsequently Chief Judge Laura Taylor Swain  
22 transferred my Case to the central District of Los Angeles for reassignment.  
23  
24  
25  
26  
27  
28

1 Steve Kim demanded the case be assigned to him for no actual legal reason other than so he and  
2 Judge Maame Frimpong can again deprive me from my my right to a trial by jury against all of the  
3 defendants for all of the causes of action listed in the complaint.  
4

5 Clearly by reading the complaint there are are not only causes of action against the rapist and sex  
6 trafficker but against my former lawyers that were corrupt and against news outlets that printed  
7 absolute untruths that I am racist with zero evidence that I have ever been a racist, I have never  
8 exhibited any type of racial discrimination in may lifetime. I am born of extremely mixed ancestry so  
9 I do not know who they alleged I am racist against. The other defendants are the hotels where I was  
10 trafficked. I am not suing the judges or the government.  
11  
12

13  
14 There is no legal basis for Judge Frimpong and Judge Kim to continue obstruction the course of  
15 justice and causing my self and everyone that cares about me more and more damage by removing  
16 my right of Due process.  
17  
18

19 There is only two conclusions to be drawn here that these judge HON STEVE KIM AND HON  
20 MAAME FRIMPONG are also accepting bribe money to deprive me of a trial while acting under the  
21 color of the law or that the Government is fully aware that I have a 100 percent solid claim against  
22 the state of California and the government of the United States for the bribes accepted by the state  
23 judges in multiple jurisdictions that deprived me of a trial and took bribes and for failing to protect  
24 me from an organized crime Syndicate and for negligent supervision of judges acting under the color  
25 of the law.  
26  
27  
28

1 These two Judges are Disqualified in pursuant with

2  
3 28 U.S. Code § 455 - Disqualification of justice, judge, or magistrate judge

4 (a)Any justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his  
5 impartiality might reasonably be questioned.

6 (b)He shall also disqualify himself in the following  
7 circumstances:

8 (1)Where he has a personal bias or prejudice concerning a  
9 party, or personal knowledge of disputed evidentiary facts  
10 concerning the proceeding;

11 (2)Where in private practice he served as lawyer in the  
12 matter in controversy, or a lawyer with whom he previously  
13 practiced law served during such association as a lawyer  
14 concerning the matter, or the judge or such lawyer has been  
a material witness concerning it;

15 (3)Where he has served in governmental employment and  
16 in such capacity participated as counsel, adviser or material  
17 witness concerning the proceeding or expressed an opinion  
18 concerning the merits of the particular case in controversy;

19 (4)He knows that he, individually or as a fiduciary, or his  
20 spouse or minor child residing in his household, has a  
21 financial interest in the subject matter in controversy or in a  
22 party to the proceeding, or any other interest that could be  
substantially affected by the outcome of the proceeding;

23 (5)He or his spouse, or a person within the third degree of  
24 relationship to either of them, or the spouse of such a  
person:

25 (i)Is a party to the proceeding, or an officer, director, or  
trustee of a party;

26 (ii)Is acting as a lawyer in the proceeding;

27 (iii)Is known by the judge to have an interest that could be  
28 substantially affected by the outcome of the proceeding;

1 **(iv)**Is to the judge's knowledge likely to be a material  
2 witness in the proceeding.

3 **(c)**A judge should inform himself about his personal  
4 and fiduciary financial interests, and make a reasonable  
5 effort to inform himself about the personal financial  
6 interests of his spouse and minor children residing in his  
household.

7 **(d)**For the purposes of this section the following words or  
8 phrases shall have the meaning indicated:

9 **(1)**"proceeding" includes pretrial, trial, appellate review, or  
other stages of litigation;

10 **(2)**the degree of relationship is calculated according to the  
11 civil law system;

12 **(3)**"fiduciary" includes such relationships as executor,  
13 administrator, trustee, and guardian;

14 **(4)**"financial interest" means ownership of a legal or  
equitable interest, however small, or a relationship as  
15 director, adviser, or other active participant in the affairs of  
16 a party, except that:

17 **(i)**Ownership in a mutual or common investment fund that  
18 holds securities is not a "financial interest" in such securities  
19 unless the judge participates in the management of the  
fund;

20 **(ii)**An office in an educational, religious, charitable,  
21 fraternal, or civic organization is not a "financial interest" in  
securities held by the organization;

22 **(iii)**The proprietary interest of a policyholder in a mutual  
23 insurance company, of a depositor in a mutual savings  
24 association, or a similar proprietary interest, is a "financial  
25 interest" in the organization only if the outcome of  
26 the proceeding could substantially affect the value of the  
interest;

27 **(iv)**Ownership of government securities is a "financial  
28 interest" in the issuer only if the outcome of

1 the proceeding could substantially affect the value of the  
2 securities.

3 **(e)**No justice, judge, or magistrate judge shall accept from  
4 the parties to the proceeding a waiver of any ground for  
5 disqualification enumerated in subsection (b). Where the  
6 ground for disqualification arises only under subsection (a),  
7 waiver may be accepted provided it is preceded by a full  
8 disclosure on the record of the basis for disqualification.

9 **(f)**Notwithstanding the preceding provisions of this section,  
10 if any justice, judge, magistrate judge, or bankruptcy judge  
11 to whom a matter has been assigned would be disqualified,  
12 after substantial judicial time has been devoted to the  
13 matter, because of the appearance or discovery, after the  
14 matter was assigned to him or her, that he or she  
15 individually or as a fiduciary, or his or her spouse or minor  
16 child residing in his or her household, has a financial  
17 interest in a party (other than an interest that could be  
18 substantially affected by the outcome), disqualification is  
19 not required if the justice, judge, magistrate judge,  
20 bankruptcy judge, spouse or minor child, as the case may  
21 be, divests himself or herself of the interest that provides  
22 the grounds for the disqualification.

23 (June 25, 1948, ch. 646, [62 Stat. 908](#); [Pub. L. 93-512](#),  
24 [§ 1](#), Dec. 5, 1974, [88 Stat. 1609](#); [Pub. L. 95-598](#), title II,  
25 [§ 214\(a\)](#), (b), Nov. 6, 1978, [92 Stat. 2661](#); [Pub. L. 100-](#)  
26 [702](#), title X, [§ 1007](#), Nov. 19, 1988, [102 Stat. 4667](#); [Pub. L.](#)  
27 [101-650](#), title III, [§ 321](#), Dec. 1, 1990, [104 Stat. 5117](#).)

28 It is in evidence that judges in federal court state court and the supreme court are guilty of taking  
bribes from the rich.



1 This is America and due process is the pillar of our Justice system yet because I was a slave I am  
2 not seen as a person in the eye of the judges. I have had every Human right, civil right and  
3 constitutional right stripped from me by judges acting under the color of the law with no trial. Yet my  
4 traffickers walk around freely raping and trafficking other girls and women.  
5

6  
7 They police know this human trafficking is happening and are limited by the government to what they  
8 can do. Vice Knows and admits they know it's happening.  
9

10  
11 The DOJ knows this is happening to millions of people who are trafficked everyday yet Judges  
12 appointed by the people are further dehumanizing me.  
13

14 These Judges are acting very dishonorably and invalidated the THE CONSTITUTION OF THE  
15 STATES.  
16

17 I will accept any other Presiding Judge and Magistrate judge.  
18  
19

20 I am one of many millions of people that are trafficked everyday. And these Judges are sending a  
21 loud clear message through society and to the world that once your life has been stolen by traffickers  
22 you can never be free because the Judiciary would rather line their pockets than take a stand against  
23 modern day slavery.  
24

25  
26 Every Judge involved in this should be removed from the bench and admonished for their  
27 participation in this. Once I have fair Judges my faith in the judiciary will be restored.  
28

1 I was a 15 year old child when this began and it has never ceased. My exploitation is now worse  
2 than ever.

3 I grew up on a farm I went to religious services I volunteered. I loved my family. I had no idea this  
4 underworld existed. I could have been anyones teenage girl one of millions that are still in the  
5 clutches of traffickers and if I do not have a trial I will be murdered or trafficked again as a judge had  
6 zero discretion in forcing me to publicly name that I was trafficked by The Hells Angels.  
7

8  
9  
10 I always believed in Law enforcement.

11 I had one hundred percent faith in the Judiciary.

12 Without a fair justice system accessible for all the entire country is in severe danger.

13  
14 I have called several major law schools I have called many major law firms they have reviewed my  
15 case and they concur that I have been deprived of my right of due process.

16 I will not allow what has happened to me to be swept under the carpet I have always had the right to  
17 life and a fair trial.  
18

19  
20 Judge Maame Frimpong and Judge Steve Kim Must immediately be removed from any and all cases  
21 involving my life and my human trafficking.  
22

23  
24 I am not suing the government and my right to due process can not be deprived because the judges  
25 corruption would become known in discovery. That is not how the law works. Serial killers on death  
26 row are afforded due process and have more human rights that I do.  
27

28 For everyones convenience.

28 U.S. Code § 351 - Complaints; judge defined

**(a) Filing of Complaint by Any Person.—**

Any person alleging that a judge has engaged in conduct prejudicial to the effective and expeditious administration of the business of the courts, or alleging that such judge is unable to discharge all the duties of office by reason of mental or physical disability, may file with the clerk of the court of appeals for the circuit a written complaint containing a brief statement of the facts constituting such conduct.

**(b) Identifying Complaint by Chief Judge.—**

In the interests of the effective and expeditious administration of the business of the courts and on the basis of information available to the chief judge of the circuit, the chief judge may, by written order stating reasons therefor, identify a complaint for purposes of this chapter and thereby dispense with filing of a written complaint.

**(c) Transmittal of Complaint.—**

Upon receipt of a complaint filed under subsection (a), the clerk shall promptly transmit the complaint to the chief judge of the circuit, or, if the conduct complained of is that of the chief judge, to that circuit judge in regular active service next senior in date of commission (hereafter, for purposes of this chapter only, included in the term “chief judge”). The clerk shall simultaneously transmit a copy of the complaint to the judge whose conduct is the subject of the complaint. The clerk shall also transmit a copy of any complaint identified under subsection (b) to the judge whose conduct is the subject of the complaint.

**(d) Definitions.—**In this chapter—

**(1)** the term “judge” means a circuit judge, district judge, bankruptcy judge, or magistrate judge; and

1 (2)the term “complainant” means the person filing a  
2 complaint under subsection (a) of this section.  
3  
4

5 Both of these federal judges have taken oaths both judges are paid for by the people and are a  
6 branch of the government to serve the people not to deprive people of their human rights,  
7 constitutional rights and civil rights.  
8  
9  
10  
11  
12

13 Hon. Maame Frimpong appointed by the President of the United States of America is a Black  
14 women in America, privileged enough to have attended Harvard and Yale has been a lawyer for many  
15 years was employed at the department of justice and knows that not only plaintiff in this case but all  
16 people have the rights ratified in the U.S. constitution and its amendments.  
17  
18  
19

20 These judges are required by law and their appointments as officers of the court to never deprive  
21 anyone of their conditional rights nor their civil rights.  
22

23 Plaintiff has requested new judges and has previously filed a motion to disqualify Justice Steve Kim  
24 for being prejudice and biased against plaintiff without ever having seen or spoken to her he  
25 stigmatized her.  
26  
27  
28

1 Plaintiff has agreed not to sue the 14 judges who have deprived her of her rights while acting under  
2 the color of the law, yet these federal judges know that Plaintiff has the right to sue all defendants in  
3 the instant case having reviewed the evidence implicating showing the merits of all her cases if they  
4 went before judge and jury plaintiff would win all of the cases, yet these Judges are still willing to  
5 deprive plaintiff of her rights with zero legal basis to do so which again Invalidates the United States  
6 Constitution.  
7

8  
9  
10 Even worse these Judges are well aware that if plaintiff is not afforded a trial against defendants  
11 she will die after already being enslaved, raped, deprived of medical treatment, being forced into  
12 homelessness and for over 9 years after being forced from her only home, plaintiff has been enduring  
13 every possible the of obstruction of the civil and criminal justice systems by defendants.  
14

15  
16 Plaintiff agrees not to sue any of the Judges who's actions have caused her irreparable harm but  
17 respectfully requests new Judges capable of being fair and unbiased and acting as they are appointed  
18 to do and act ethically under the color of the the law.  
19

20  
21 Every time another judge derives Plaintiff of her rights they are signing plaintiffs death certificate  
22 because they have been made aware that without the critical medical treatment require to save  
23 plaintiffs life that she has been deprived of she will die.  
24

25  
26 Justice Kim And Justice Frimpong the Judges are also aware that because of the deprivation of all  
27 of her rights and obstruction of justice plaintiff has been forced into homelessness.  
28

1  
2 Honorable Frimpong whom plaintiff was happy to have as her judge and believed would extend  
3 her a fair trial might refer to her own answers from interviews she has given as to why she wants to  
4 be a Judge and how she justifies depriving plaintiff of a fair trial by jury within her duties or  
5 profession that she wants to be a judge to make society fair and that it is Honorable Frimpong's  
6 sincere hope that everyone walks away with greater confidence in our justice system and a greater  
7 understanding of the role that judges play in making our Constitutional rights a reality.  
8  
9

10 .  
11 After serving on the Los Angeles County Superior Court for nearly two years, Judge Maame  
12 Ewusi-Mensah Frimpong '93 is seeking reelection. Judge Frimpong graduated from Vivian  
13 Webb School as Valedictorian of her class. She later graduated from Harvard University and  
14 went on to earn her law degree from Yale. After Frimpong started her legal career in a  
15 clerkship with a judge on the federal court of appeals, she worked at an international law  
16 firm, and then served in the Justice Department where she took on roles under Attorney  
17 General Eric Holder and Associate Attorney General Tony West during President Obama's  
18 administration. She has practiced in numerous areas of the law, including white-collar  
19 crime, immigration, civil rights, environmental protection, and consumer protection. But  
20 serving on the Los Angeles County Superior Court has been the highlight of Frimpong's  
21 illustrious career. She was appointed to the bench in 2015 and hopes to be reelected later  
22 this year. Below, she reflects on her campaign, career and hopes for the future.

23 **Q. What made you want to become a judge?**

24 What may be surprising to some is that although I have wanted to be an attorney since I  
25 was a child, for most of my career, I had no interest in becoming a judge. For a long time, I  
26 thought the judge simply decided between the positions presented by the attorneys before  
27 her, and so the real power was held by those who crafted those arguments and presented  
28 them in court. I had wanted to become a lawyer to make society work better and fairer, so  
being an attorney seemed the best role for me. And I truly loved advocating for my clients.  
Over time, however, I came to see that the judge is also an advocate—for justice and the  
rule of law. The more I considered it, the more I felt drawn to the role. And ultimately, the  
opportunity to grapple with complex legal questions, make difficult decisions, demystify  
the justice system for the public, and protect the rights of all who come before me was too  
intriguing not to try.

1 **Q. Your website notes that serving in the court has been the highlight of your career.**  
 2 **Why is that?**

3 I have always loved the law and loved being an advocate for my client during my years as a  
 4 practicing attorney. I feel that now I am an advocate for justice and the rule of law and our  
 5 system of democracy, which is extremely gratifying. Serving as a judge is also extremely  
 6 challenging as you are presented with new scenarios every day and the law is constantly  
 7 changing. I love anything with a steep learning curve. As a judge on the Los Angeles  
 8 Superior Court, my work is challenging, meaningful, and interesting, and my colleagues are  
 9 smart, collegial, ethical, and committed to doing the right thing. That is my definition of a  
 10 dream job!

11 **Q. What do you want to achieve during a second term?**

12 I want to build on what I had the opportunity to do during my first term—advocate for  
 13 justice and the rule of law, demystify the justice system for the general public, and ensure  
 14 that every individual in my courtroom is treated with dignity and respect.

15 It is very important for me to always stay abreast of changes in the law, always be prepared  
 16 for every hearing, and always make thoughtful, considered, and deliberate decisions. In  
 17 addition, every judge is responsible for the “tone” set in her courtroom. For me, I hope to  
 18 continue to set a tone that is warm, but recognizes the importance and formality of the  
 19 proceedings, and, above all, ensures that every individual—every juror, every witness, every  
 20 defendant, every attorney—is treated with dignity and respect. Even if someone is accused  
 21 of or convicted of a crime, he is still entitled to be treated with dignity and respect.

22 Finally, one of the best parts of my job is helping the general public understand the justice  
 23 system. I get to do this with prospective jurors, but I also take every opportunity outside of  
 24 my courtroom to do this, especially with young people. For example, I am one of three  
 25 judges handling the Teen Court program at a local high school where minors charged for  
 26 the first time with relatively low-level offenses get a “trial” by a jury of their peers—other  
 27 high school students. The program is a great way to introduce the accused minor as well as  
 28 the jurors and other participants at the high school to the principles of our justice system  
 that we are so proud of. I am excited to continue the Teen Court program and other  
 community outreach initiatives.

29 **Q. Are you focusing on anything specific in your campaign?**

30 Yes. For me, the campaign has given me an opportunity and a platform to discuss why it is  
 31 important to have judges that are competent, fair, and compassionate. It is my sincere hope  
 32 that everyone I speak with as I campaign walks away with greater confidence in our justice  
 33 system and a greater understanding of the role that judges play in making our  
 34 Constitutional rights a reality.

1 Most of us understand that we have certain rights based upon our Constitution, and many  
 2 of us understand that the Supreme Court plays a role in interpreting those rights, but I  
 3 think few people understand that it is ordinary judges like me who protect those rights  
 4 every time you are in a courtroom. For example, the Supreme Court has determined that  
 5 our Constitution protects us from unreasonable searches and seizures by the police. It is  
 6 judges like me, however, that determine, in any given case, if the police action was  
 unreasonable, according to the law.

7 **Q. You have worked in a variety of roles during your legal career. Is there one in**  
 8 **particular that prepared you for this role the most? Or is there an important lesson**  
 you learned during one of those jobs?

9 I really draw on skills developed in all of my roles nearly every day. But if there is one lesson  
 10 that I learned from my earliest days as a judicial law clerk until my most recent role as a  
 11 general counsel, it was to never compromise on doing justice and getting the answer right.  
 12 In my years at the Justice Department under President Obama and Attorney General Holder,  
 13 this was emphasized in everything that we did. I was often inspired by a quote over the door  
 14 to the Attorney General's Office in the Department of Justice in Washington, DC: the United  
 15 States wins its case whenever justice is done one of its citizens in the courts. The emphasis  
 was on doing justice, not winning cases. And this has translated seamlessly for me to my  
 role as a judge: My North Star should always be doing justice, not ensuring that a particular  
 side wins.

16 **Q. Do you think Webb had any impact on your values, work ethic or career path?**

17 Absolutely! All three! Webb certainly cultivated in me a drive for excellence, and at Webb I  
 18 learned that to do well, I needed to work very hard. Ultimately, I believe my work ethic came  
 19 from my parents, but it was further developed at Webb. And, although I am not sure I  
 20 realized it at the time, the Honor Code system greatly impacted me. I probably already came  
 21 into Webb as a young person who valued honesty and integrity, but at Webb, I was placed in  
 22 a community of young people who were also striving to make the principles of honesty and  
 23 integrity reality on a day-to-day basis. As a lawyer, and now as a judge, my integrity is  
 24 sacrosanct. I never want to compromise it. And Webb certainly influenced my career path—  
 those hours spent poring over the Federalist Papers and the other great documents of our  
 history impressed upon me the beauty and brilliance of our legal system, and made me  
 excited to be a part of it.

25 **Q. Is there anything you think differentiates the Vivian Webb School alumni network**  
 26 **from other alumni networks?**

27 There is something special about a girls school, even a girls school within a coordinate  
 28 environment such as Webb. In my most formative years, I was taught that there was



1 nothing second-class about a women-only environment; to the contrary, there was much to  
2 be celebrated. I work in a male-dominated field, and have worked in male-dominated  
3 environments for much of my career. I distinctly recall numerous meetings, negotiations, or  
4 court proceedings where I was the only female lawyer; now I am one of a minority of female  
5 judges. This has been challenging at times, but I never let anyone make me feel as though I  
6 did not belong. And the ladies I met at Webb continue to inspire me because they are  
7 phenomenal women who support other phenomenal women.

8 **Q. What would you want alumni who haven't met you to know about you?**

9 That what motivates me now, and what has motivated me throughout my career is the  
10 opportunity to make a difference in people's lives. My career has been the product of hard  
11 work, wonderful relationships, and serendipity. I feel so blessed that my parents, through  
12 their hard work and sacrifices, were able to give me such a great start at Webb, which has  
13 led me to where I am today.

14 Even though plaintiff was trafficked at a young age plaintiff believed in the criminal and Civil Justice  
15 system and everyone who has watched and endured what plaintiff has been put through in this Justice  
16 system now doubts that there is any Justice in the system we all once had confidence in.

17 Realizing that slavery still exists today in different forms is critical for women in positions of power  
18 not to persist in being part of the problem caused by men but to start facilitating in bringing an end to  
19 the sexual slavery and exploitation of girls and women.

20 If female judges or any judge is willing to say these girls and women have no legal rights there is  
21 not hope of ending modern day slavery, child pornography, human trafficking, child sex trafficking or  
22 child molestation.

23 Plaintiff knows that what has happened to her is wrong on every level. Plaintiff knows that she  
24 will die at a sooner date that she ever would have if justice had not been obstructed.  
25

1  
2 These facts are true and in evidence. Plaintiff is determined that her life and all that she has suffered  
3 will not be in vain and that at the very least her voice will assure that other children will not face the  
4 same fate and be robbed of their lives.  
5

6  
7 Plaintiff respectfully requests that these judges be disqualified and not interfere in plaintiff's right to  
8 bring lawsuits against these lawyers for all of their malice the traffickers or plaintiff's former lawyers  
9 the surgeon and the hospital. The underlying facts in all of these cases are the same the evidence is  
10 the same and none of these would have happened to plaintiff if she was not trafficked by an organized  
11 crime syndicate into the hands of a notorious sexual predator who's lawyers and plaintiff's former  
12 lawyers continue to conspire and are trying to secure a 100 million dollar settlement against plaintiff  
13 by obstructing justice further indebting plaintiff who has no money to feed herself, provide herself  
14 with shelter or medical treatment.  
15  
16  
17  
18

19 In Addition Hon. Maame Frimpong Hon. Steve Kim are aware that plaintiff has to represent  
20 herself against all of these powerful defendants has no law degree and is in dire need of medical  
21 treatment which has been removed from her by the absolute abuse of legal process obstruction of  
22 justice and Abuse she has endured. She is denied Legal Aid And public Counsel because lawyers are  
23 defendants.  
24  
25

26 In furtherance of the abuse of process and obstruction of Justice by sexual predator and His  
27 lawyers Quinn Emanuel They have filed multiple motions and pleadings in the multiple cases and  
28

1 refuse to serve a single pleading or notice to Amber Doe although she made innumerable demands for  
2 service of legal pleadings for a cases in which she is either a plaintiff, defendant or witness.

3  
4  
5 Plaintiff has the right to proceed to trial expeditiously she has already been victimized by the  
6 Lawyers in this case since Feb 2014. It is Now August 2023.

7  
8  
9 Plaintiff must not be denied her rights under the constitution to have a trial by jury any longer the  
10 entire constitution of the Untied States would be come invalid if this abuse of process continues. The  
11 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
12 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.

13  
14  
15 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form  
16 of a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff  
17 has never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
18 raped any person nor has she obstructed justice.

19  
20  
21 These judges are aware that plaintiff has been victimized be a great many people inclusive of the  
22 lawyers in the instant case. To deprive plaintiff of her right to the justice system again is improper.  
23 And only serves to delay proceedings.

24  
25  
26 If Judges plan is to wait for plaintiff to die as a way to silence her about all of the crimes  
27 committed against her during her lifetime this serves zero purpose as plaintiffs surviving family who  
28

1 have been harmed through the Malicious conspiracy by the lawyers in the instant case plaintiffs  
2 living relations intend to sue for all the causes of action in addition to plaintiffs wrongful death.  
3  
4  
5

6 A person aware of the facts might reasonably entertain a doubt that the judge would be able to  
7 be impartial in that these Judges are intent on covering up a sex trafficking conspiracy helping Quinn  
8 Emanuel continue to obstruct justice and bring further harm to plaintiff.  
9

10  
11 Plaintiff accepts any Judge other than Hon. Steve Kim to be the magistrate in her case and believes  
12 that she will then not be deprived of her rights as this is the proper jurisdiction for the instant case  
13 Los Angeles district court in the Central district for California.  
14  
15  
16  
17

18 This is the correct Jurisdiction for the case as most of the defendants and companies are based in  
19 Los Angeles. The Amount in dispute is over \$75,000.00. The cases includes international boundaries.  
20

21 The Judges must not circumvent the law by continuing to deprive plaintiff of her Constitutional  
22 rights, civil rights and human rights.  
23  
24

25 . I first became aware of the grounds for disqualification of judge Kim And Judge Frimpong  
26 when they demanded they be assigned to the case after Diane Doolittle a defendant who had  
27 perverted the course of justice for 9.5 years demanded via a fedex sent to Juge Laura Taylo Swaine  
28

1 not allow my trial to take place based on Maame Frimpongs erroneous denial of my Fee Waiver  
2 earlier this year.

3 The instant case is only against the named defendants and filed under a pseudonym so that  
4 everyone stops attacking plaintiff and depriving her of her rights.

5 Plaintiff Noticed that Justice Frimpong transferred an unrelated case to her docket for no apparent  
6 reason. No work has to be repeated as the Judges have yet to even signed a fee waiver let alone make  
7 any legal rulings.  
8

9  
10  
11  
12 Plaintiff requests no favoritism she request after 9.5 years of enduring having all of her legal rights  
13 tampered with and obstructed by defendants that she be treated like a human being who lives and  
14 breaths and be extended her right of trial by Jury.  
15

16  
17 Plaintiff must be allowed to proceed to trial on the merits of her case she seeks relief specifically  
18 pursuant of [18 U.S. Code § 1595 - Civil remedy](#) without a trial plaintiff will be raped, murdered, homeless  
19 trafficked or left to die with no medical treatment when she has the right to a trial to rectify all of  
20 this?  
21

22  
23 Plaintiff requests any judge in Federal court that will not prejudice and stigmatize plaintiff and  
24 allow the defendants to continue to obstruct the civil and criminal judicial process. This  
25 disqualification must take place in the name of fair access to the courts by all and to prevent further  
26 violations of my human rights, constitutional rights and civil rights.  
27  
28

Judge Maame Frimpong and Judge Steve Kim have repeatedly shown their prejudice towards plaintiff.

28 CFR § 76.16 - Disqualification of a Judge.

**(a)** When a Judge deems himself or herself disqualified to preside in a particular proceeding, such Judge shall withdraw therefrom by notice on the record directed to the Chief Administrative Hearing Officer for the district in which the case is brought or, if there is no Chief Administrative Hearing Officer, to the Attorney General.

**(b)** Whenever any party shall deem the Judge for any reason to be disqualified to preside, or to continue to preside, in a particular proceeding, that party shall file with the Judge a motion to recuse. The motion shall be supported by an affidavit setting forth the alleged grounds for disqualification. The Judge shall rule upon the motion.

**(c)** In the event of disqualification or recusal of a Judge as provided in paragraph (a) or (b) of this section, the Chief Administrative Hearing Officer or the Attorney General shall refer the matter to another Judge for further proceedings.

**(d)** If the Judge denies a motion to disqualify, the Attorney General may determine the matter only as part of the Attorney General's review of the initial decision on appeal, if any.

1  
2 Judges might find it odd that plaintiff is pleading with them for a trial but plaintiff is accustom to  
3 negotiating her survival on a daily basis with a very powerful international organized crime syndicate  
4 so requesting judges not to deprive plaintiff of her life is far less dangerous.  
5

6  
7 Plaintiff has filed this motion at the earliest possible opportunity being the day the case was available  
8 on the docket.  
9

10 In this case, Judge Steve Kim and Judge Maame Frimpong exceeded the bounds of  
11 reasonable conduct for a judge seeking to exercise control of the proceedings and reach an unfair and  
12 efficient result.  
13

14  
15 The behavior of Judge Steve Kim and Hon Maame Frimpong involves conduct that clearly  
16 did not afford me a reasonable opportunity to be heard and present my evidence. The obligation of a  
17 judge to dispose of matters promptly and efficiently must not take precedence over the judge's  
18 obligation to dispose of the matters fairly and with patience. For example the Canons of Judicial  
19 Ethics state in pertinent part that, when a litigant is self-represented, a judge has the discretion to take  
20 reasonable steps, appropriate under the circumstances and consistent with the law and the canons, to  
21 enable the litigant to be heard. ... *Cannon 3, Advisory Comm. Commentary*, Page 17, Lines 24-30.  
22  
23  
24  
25  
26  
27  
28

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I.**

**STATEMENT OF FACTS**

This case is **CIVIL ACTION For** 1. Bad Faith 2. Conspiracy 3. Obstruction of Justice 4. Personal Injury 5. Fraud 6. Attorney Interference 7. Stalking 8. Violation of the Trafficking Victims Protection Act 9. Racketeering 10. Civil Theft 11. Wrongful Death 12. Deceit 13. INTENTIONAL INTERFERENCE WITH ECONOMIC RELATIONS 14. Unjust enrichment 15. Malicious Prosecution 16. INTERFERENCE WITH EXISTING CONTRACT- NEGLIGENT 17. INTERFERENCE WITH EXISTING CONTRACT-INTENTIONAL 18. MONEY HAD AND RECEIVED 19. WILLFUL MISCONDUCT 20. UNFAIR COMPETITION VIOLATION OF PUBLIC POLICY 21. BREACH OF PRIVACY 22. Intentional infliction of emotional distress 22. Intentional infliction of emotional distress 23. PROFESSIONAL NEGLIGENCE 24. Violation of Victims of Crime Act 25. Violation of Marcys law 26. Violation of Ambers Law 27. Defamation 28. Violation of Megans Law 29. Violation of Jessies law 30. Violation of Jessicas Law 31. Violation of Chelseas Law 32. Unlawful Endangerment 33. Violation of the Bane act 34. Violation of the Ralph act 35. GROSS NEGLIGENCE 36. Tortious Interference 37. Trespass to chattels 38. Conversion 39. Violation of the Ku Klux Klan act 40. Violation of the Mann Act 41. Violation of the Human Rights Act 42. Violation of The California Constitution 43. Invasion Of Privacy 44. False Light 45. Inciting Gender Violence 46. Legal Misconduct 47. Negligent Supervision of Diane Doolittle 48. INTERFERENCE WITH MEDICAL TREATMENT



1 Quinn Emanuel lawyers have acted in SUPREME ABSOLUTE MALICE and have obstructed justice  
2 on behalf of Client for over 9 years and Victimized Eve Doe  
3  
4

5 Eve Doe Doe objects to the Hon. Steve Kim presiding at any further hearings or proceedings  
6 concerning this action on the grounds that a person aware of the facts might reasonably entertain a  
7 doubt that the judge would be able to be impartial in that he as already been made aware that  
8 Plaintiffs rights have been violated and that she is not being served the pleadings or times and dates  
9 that QuinnEmanuel who are both witnesses and defendants in the case are going before the judge and  
10 obtaining his signature on legal documents refer to court record.  
11  
12  
13  
14

15 The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the  
16 grounds that: This case was filed June 19th, 2023. Within 5 days of the date of filing the complaint  
17 for  
18

19 1. Bad Faith 2. Conspiracy 3. Obstruction of Justice 4. Personal Injury 5. Fraud 6. Attorney  
20 Interference 7. Stalking 8. Violation of the Trafficking Victims Protection Act 9. Racketeering 10.  
21 Civil Theft 11. Wrongful Death 12. Deceit 13. INTENTIONAL INTERFERENCE WITH  
22 ECONOMIC RELATIONS 14. Unjust enrichment 15. Malicious Prosecution 16. INTERFERENCE  
23 WITH EXISTING CONTRACT- NEGLIGENT 17. INTERFERENCE WITH EXISTING  
24 CONTRACT-INTENTIONAL 18. MONEY HAD AND RECEIVED 19. WILLFUL  
25 MISCONDUCT 20. UNFAIR COMPETITION VIOLATION OF PUBLIC POLICY 21. BREACH  
26 OF PRIVACY 22. Intentional infliction of emotional distress 23. PROFESSIONAL NEGLIGENCE  
27  
28

24. Violation of Victims of Crime Act 25. Violation of Marcys law 26. Violation of Ambers Law 27. Defamation 28. Violation of Megans Law 29. Violation of Jessies law 30. Violation of Jessicas Law 31. Violation of Chelseas Law 32. Unlawful Endangerment 33. Violation of the Bane act 34. Violation of the Ralph act 35. GROSS NEGLIGENCE 36. Tortious Interference 37. Trespass to chattels 38. Conversion 39. Violation of the Ku Klux Klan act 40. Violation of the Mann Act 41. Violation of the Human Rights Act 42. Violation of The California Constitution 43. Invasion Of Privacy 44. False Light 45. Inciting Gender Violence 46. Legal Misconduct 47. Negligent Supervision of Diane Doolittle 48. INTERFERENCE WITH MEDICAL infliction of emotional distress

2. The fee waiver should have been granted as I have declared under penalty of perjury that I can not afford to pay for filing fees in the instant case or the the filing fees in the several other cases where my situation of human trafficking is being explored for profit by dozens if not hundreds of lawyers from the largest law firms in the Unites States. 50 days after the filing of the fee waiver it still has not been granted by Hon. Steve Kim.

Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful defendants has no law degree and is in dire need of medical treatment which has been removed from her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is denied Legal Aid And public Counsel.

In further of the abuse of process and obstruction of Justice by Quinn Emanuel They have filed multiple motions and pleading in the instant case and refused to serve a single pleading or notice to Eve Doe although she has made numerous demands for service of the pleadings per week.

1 Plaintiff has repeatedly stated under oath to the courts that she is not BEING served legal pleadings  
2 discovery motions or anything related to at least tree cases where she is either the plaintiff or  
3 defendants in multiple jurisdictions.  
4

5 Plaintiff has the right to proceed to trial expeditiously she has already been victimized by the  
6 Lawyers in this case since Feb 2014. It is Now July, 2023.  
7  
8  
9

10 It is in evidence that Hon. Steve Kim Believes that a separate set of laws and rules of the court apply  
11 to plaintiff that the rest of humanity.  
12  
13

14 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
15 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
16 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
17 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
18  
19  
20  
21

## 22 II.

### 23 ARGUMENT

24  
25 A. CALIFORNIA LAW STATES THAT A JUDGE IS DISQUALIFIED WHERE  
26 THEY HAVE A FINANCIAL INTEREST IN A PARTY TO THE ACTION OR FOR  
27 ANY REASON OTHER PERSONS AWARE OF THE FACTS MIGHT REASONABLY  
28

1 **ENTERTAIN A DOUBT THAT THE JUDGE WOULD BE ABLE TO BE IMPARTIAL AND A**  
2 **JUDGE’S BIAS TOWARDS A PARTY IS CLEARLY A GROUND FOR**  
3 **DISQUALIFICATION**  
4

5 California law states that a judge is disqualified where, for any reason:

6 “The judge has a financial interest in the subject matter in a proceeding or in a party to the  
7 proceeding”. See *Code of Civil Procedure* § 170.1(a)(3)(A)  
8

9 “Other persons aware of the facts might reasonably entertain a doubt that the judge would be  
10 able to be impartial”. See *Code of Civil Procedure* § 170.1(a)(6)(A)(iii).

11 *Code of Civil Procedure* §170.5 states in pertinent part that, “For the purposes of Sections 170  
12 to 170.5, inclusive, the following definitions apply:

13 (a) “Judge” means judges of the superior courts, and court commissioners and referees.  
14

15 (b) “Financial interest” means ownership of more than a 1 percent legal or equitable interest  
16 in a party, or a legal or equitable interest in a party of a fair market value in excess of one thousand  
17 five hundred dollars (\$1,500), or a relationship as director, advisor or other active participant in the  
18 affairs of a party, except as follows:  
19

20 The test for impartiality is objective in that “The situation must be viewed through the eyes of  
21 the ... average person on the street” as of the time the motion is brought. *United Farm Workers of*  
22 *America v. Sup.Ct. (Maggio, Inc)*. (1985) 170 Cal. App. 3d 97, 104 (emphasis added).  
23

24 “The word ‘might’ in the statute was intended to indicate that disqualification should follow if  
25 the reasonable man, were he to know all the circumstances, would harbor doubts about the judge's  
26 impartiality.” *United Farm Workers of America v. Sup.Ct. (Maggio, Inc)*., supra, 170 Cal.App. 3d at p.  
27 104 (emphasis added).  
28

1 Judge Steve Kim also exhibited bias towards Eve Doe in that The Hon. Steve Kim is  
 2 disqualified to preside at any further proceedings in this action on the grounds that: This case was  
 3 filed June 19th, 2023. Within 5 days of the date of filing the complaint for  
 4

5 1. Bad Faith 2. Conspiracy 3. Obstruction of Justice 4. Personal Injury 5. Fraud 6. Attorney  
 6 Interference 7. Stalking 8. Violation of the Trafficking Victims Protection Act 9. Racketeering 10.  
 7 Civil Theft 11. Wrongful Death 12. Deceit 13. INTENTIONAL INTERFERENCE WITH  
 8 ECONOMIC RELATIONS 14. Unjust enrichment 15. Malicious Prosecution 16. INTERFERENCE  
 9 WITH EXISTING CONTRACT- NEGLIGENT 17. INTERFERENCE WITH EXISTING  
 10 CONTRACT-INTENTIONAL 18. MONEY HAD AND RECEIVED 19. WILLFUL  
 11 MISCONDUCT 20. UNFAIR COMPETITION VIOLATION OF PUBLIC POLICY 21. BREACH  
 12 OF PRIVACY 22. Intentional infliction of emotional distress 23. PROFESSIONAL NEGLIGENCE  
 13 24. Violation of Victims of Crime Act 25. Violation of Marcy's law 26. Violation of Ambers Law 27.  
 14 Defamation 28. Violation of Megans Law 29. Violation of Jessies law 30. Violation of Jessicas Law  
 15 31. Violation of Chelseas Law 32. Unlawful Endangerment 33. Violation of the Bane act  
 16 34. Violation of the Ralph act 35. GROSS NEGLIGENCE 36. Tortious Interference 37. Trespass to  
 17 chattels 38. Conversion 39. Violation of the Ku Klux Klan act 40. Violation of the Mann Act 41.  
 18 Violation of the Human Rights Act 42. Violation of The California Constitution 43. Invasion Of  
 19 Privacy 44. False Light 45. Inciting Gender Violence 46. Legal Misconduct 47. Negligent  
 20 Supervision of Diane Doolittle 48. INTERFERENCE WITH MEDICAL The fee waiver should  
 21 have been granted as I have declared under penalty of perjury that I can not afford to pay for filing  
 22 fees in the instant case or the the filing fees in the several other cases where my situation of human  
 23  
 24  
 25  
 26  
 27  
 28

1 trafficking is being explored for profit by dozens if not hundreds of lawyers from the largest law  
2 firms in the United States Of America.

3  
4  
5 The Hon. Steve Kim and The Honorable Maame Frimpong are disqualified from presiding at any  
6 further proceedings in this action on the grounds that: This case was filed June 19th, 2023. Within 5  
7 days of the date of filing the complaint The fee waiver should have been granted as I have declared  
8 under penalty of perjury that I can not afford to pay for filing fees in the instant case or the the filing  
9 fees in the several other cases where my situation of human trafficking is being exploited for profit  
10 by dozens if not hundreds of lawyers from the largest law firms in the unites states. 50 days after the  
11 filing of the fee waiver it still has not been granted by Hon. Steve Kim.  
12  
13  
14  
15

16 Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful  
17 defendants has no law degree and is in dire need of medical treatment which has been removed from  
18 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
19 denied Legal Aid And public Counsel.  
20  
21

22 What Hon Steve Kim And Hon Maame Frimpong have to gain by depriving plaintiff of her right to  
23 proceed to trial is not clear. What is clear is that these Judges know that Plaintiff has the  
24 constitutional right to proceed to trial on the merits of her case.  
25  
26  
27  
28

1 If plaintiff can not proceed to trial she will invoke her right to peacefully protest the deprivation of  
2 her right to a trial which someone will likely try to deprive her of that constitutional right as will.

3  
4  
5 Plaintiff will never understand why she is nota person in the eyes of the world

6  
7 She had the right not to be enslaved

8 She had the right to a trial by jury

9  
10 She had the right not to have possession illegally seized

11 She has the right to medical treatment

12 She has the right not to be homeless

13 She has the right not to be raped

14 She has the right of self protection ‘

15 She has the right of free speech

16 She has the right of medical privacy

17 She has the right not to be stalked by men

18 She has the right of Due process

19 She has the right Of freedom and Liberty

20  
21  
22  
23  
24  
25 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the  
26 Lawyers at Quinn Emanuel in the defendants in this case since February 2014. It is Now July, 2023.  
27  
28

1  
2 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
3 entire constitution of the Untied States would be come invalid if this abuse of process continues. The  
4  
5 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
6 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
7  
8  
9  
10

11 Bias exists where the judge evidences a “predisposition to decide a cause or an issue in a  
12 certain way, which does not leave the mind perfectly open to conviction.” The judge's bias toward a  
13 party is clearly ground for disqualification. *Pacific & Southwest Annual Conf. of United Methodist*  
14 *Church v. Sup.Ct. (Barr)* (1978) 82 Cal.App. 3d 72, 86.  
15

16 **B. THE STATUTES GOVERNING DISQUALIFICATION FOR CAUSE IN**  
17 **CALIFORNIA ARE INTENDED TO ENSURE PUBLIC CONFIDENCE IN THE**  
18 **JUDICIARY AND TO PROTECT THE RIGHTS OF LITIGANTS TO A FAIR AND**  
19 **IMPARTIAL ADJUDICATOR AND THE UNITED STATES SUPREME COURT HAS**  
20 **STATED THAT A FAIR TRIAL IN A FAIR TRIBUNAL IS A BASIC REQUIREMENT OF**  
21 **DUE PROCESS**  
22  
23

24 The conduct exhibited by Judge Steve Kim showed clear evidence of bias and prejudice and  
25 deprived Amber Doe of their right to a fair and impartial adjudicator. This conduct also deprived him  
26 of his right to a fair trial in a fair tribunal which is a basic requirement of due process as stated by the  
27 United States Supreme Court.  
28



1 The California Supreme Court has stated that the, "Statutes governing disqualification for  
2 cause are intended to ensure public confidence in the judiciary and to protect the right of the litigants  
3 to a fair and impartial adjudicator." *Curle v. Superior Court* (2001) 24 Cal.4th 1057, 1070.

4 The United States Supreme Court has stated that, it is "axiomatic that [a] fair trial in a fair  
5 tribunal is a basic requirement of due process." *Caperton v. A. T. Massey Coal Company*, (2009)  
6 556 U.S. 868, 876. In *Caperton* the Supreme Court also stated that the due process clause of the  
7 federal Constitution (US Const amend XIV) can require judicial disqualification even in cases where  
8 the party requesting disqualification has not complied with any applicable state disqualification  
9 statutes, and that a showing of actual bias is not required for judicial disqualification under the due  
10 process clause.

11 "The Due Process Clause entitles a person to an impartial and disinterested tribunal..."  
12 *Marshall v. Jerrico, Inc.* (1980) 446 U.S. 238, 242; see also *Brown v. American Bicycle Group, LLC*,  
13 (2004) 224 Cal.App.4th 665, 674.

14 The well-established common law rule is that recusal is required when a judge has a direct,  
15 personal, substantial, or pecuniary interest in a case. *Caperton v. A.T. Massey Coal Co.*, supra, 556  
16 U.S. at p. 876-77; see also *Aetna Life Ins. Co. v. Lavoie*, (1986) 475 U.S. 813, 820.

17 Judges have a duty to make their decisions free from any bias or prejudice. *Cal Rules of Ct*,  
18 Standards of J Admin 10.20; Cal Rules of Ct, *Code of Judicial Ethics*, Canon 3B(5).

19 "(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the  
20 performance of judicial duties, engage in speech, gestures, or other conduct that would reasonably be  
21 perceived as (1) bias or prejudice, including but not limited to bias or prejudice based upon race, sex,  
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28

gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, or (2) sexual harassment. “

Judge also have a duty to require lawyers in proceedings before them to refrain from manifesting any bias or prejudice. *Code of Judicial Ethics*, Canon 3B(6).

“(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting, by words or conduct, bias or prejudice based upon race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation against parties, witnesses, counsel, or others.”

Judges have a duty to allow every party to a legal proceeding the full right to be heard according to law. *Code of Judicial Ethics*, Canon 3B(7).

“(7) A judge shall accord to every person who has a legal interest in a proceeding, or that person’s lawyer, full right to be heard according to law.”

**C. Amber Doe HAS SHOWN COMPELLING EVIDENCE IN SUPPORT OF THEIR OBJECTION** see court record no filing has been served on Plaintiff by defendants yet they have procured multiple signatures from Hon. Steve Kim on their pleadings that they have not served Plaintiff nor have they provided her the signed copies and she has no access to a credit card as Quinn Emanuel tampered with plaintiffs banks and demanded they remove her access to all credit products inclusive of credit cards so she has no ability to pay for downloads from Pacer or the Orange County Court website in the court where the Judges are allowing proceedings to move forward against Amber Doe with no regard for the fact that the lawyers are conspiring together to obtain \$ 100 million dollars for no reason while Eve Doe suffers debilitating medical conditions caused by defendants abuse and has no shelter because of

1 defendants abuse and continues to be stalked by multiple men that she does not know. Amber  
2 Doe has no ability to download more than the limited \$30 per quarter in documents from pacer.

3  
4  
5 Judge Hon Frimpong who signed order on June 30, 2023 to remove new assigned  
6 Judges Honorable George Wu And Honorable Alka Sagar did so improperly with no legal basis  
7 to do so.

8 Diane Doolittle whom is a defendant in this case sent a fedex to Chief Judge Laura Taylor  
9 Swain for everyones convenience I have attached Chief Judge Laura Taylor Swains Rulings to  
10 this complaint citing Central District of California is the proper Jurisdiction for my trial.  
11

12  
13  
14 If plaintiff is again deprived of her right to a trial and due process by these judges acting  
15 under the color of the law. I move to extrude the people who have committed the crimes against  
16 me to other countries where by which they committed the crimes inclusive of Canada and the  
17 United Kingdom.  
18

19  
20 The judges are not duplicating work as the judges have yet to make any legal rulings  
21 employing the law nor have they heard a motion all they have done is further dehumanize  
22 plaintiff and state that all of the suffering she has endured is not worthy of a trial or the respect  
23 to be shown to all human beings by Judges acting under the color of the law.  
24

25  
26 Plaintiff respectfully requests that she proceed to trial and not be deprived of her  
27 constitutional rights, human rights and civil rights any longer.  
28

1

2 **THUS DISQUALIFICATION IS REQUIRED IN THE INTERESTS OF JUSTICE**

3 In *DCH Health Servs. Corp. v Waite* (2002) 95 Cal.App. 4th 829, 833 a California Court of  
 4 Appeal stated that recusal may be required on the basis of a mere appearance of impropriety.  
 5

6 Other cases decided by the California Courts of Appeal have stated that actual bias need not  
 7 be present. *Roitz v Coldwell Banker Residential Brokerage Co.*, (1998) 62 Cal.App.4th 716, 723.  
 8

9 If an average person could entertain doubt about the judge's impartiality, disqualification is  
 10 mandated. *Catchpole v Brannon* (1995) 36 Cal.App. 4th 237, 246.

11 An appellate court will not speculate about whether the bias was actual or merely apparent;  
 12 reversal is required in such a case, with remand of the matter to a different judge for a new hearing on  
 13 all issues. *In re Wagner* (2005) 127 Cal.App 4th 138, 147–149; see also *Roitz v Coldwell Banker*  
 14 *Residential Brokerage Co.*, supra, 62 Cal.App 4th at p. 723; *Catchpole v Brannon*, supra, 36 Cal.App.  
 15 4th at p. 247.  
 16

17 One situation in which bias was found involved a judge who interrupted counsel and a litigant  
 18 on several occasions. See *Dodds v Commission on Judicial Performance* (1995) 12 Cal.App. 4th 163,  
 19 176–177.  
 20

21 The numerous instances of bias towards plaintiff by Judge Steve Kim in her fight to vindicate  
 22 her rights in this case provide ample justification for the disqualification of Judge Steve Kim.  
 23

24 When the judge has exhibited numerous instances of bias toward a party in the case, such that  
 25 the average person might justifiably doubt whether the judge could be impartial, there is ample  
 26 justification for disqualifying the judge. *Catchpole v Brannon*, supra, 36 Cal.App. A4th at p. 262.  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMBER DOE,

Plaintiff,

-against-

SEQUOIA CAPITAL, et al.,

Defendants.

23-CV-5881 (UA)

ORDER GRANTING IFP APPLICATION

LAURA TAYLOR SWAIN, Chief United States District Judge:

Leave to proceed in this Court without prepayment of fees is authorized. *See* 28 U.S.C.

§ 1915.

SO ORDERED.

Dated: July 18, 2023  
New York, New York

/s/ Laura Taylor Swain  
\_\_\_\_\_  
LAURA TAYLOR SWAIN  
Chief United States District Judge

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMBER DOE,

Plaintiffs,

-against-

SEQUOIA CAPITAL, et al.,

Defendants.

23-CV-5881 (LTS)

TRANSFER ORDER

LAURA TAYLOR SWAIN, Chief United States District Judge:

Plaintiff, who resides in Los Angeles, California, brings this *pro se* action asserting claims arising out of alleged sex trafficking. Named as Defendants are individuals, law firms, and other entities. On July 17, 2023, the Court granted Plaintiff's request to proceed *in forma pauperis* ("IFP"). On July 28, 2023, Plaintiff filed a 1,355-page amended complaint.<sup>1</sup>

On July 28, 2023, Defendant Dianne M. Doolittle, a lawyer from the law firm Quinn Emmanuel – also named as a Defendant – informed the Court that the United States District Court for the Central District of California recently dismissed two actions filed by Plaintiff that are substantially similar to the action filed here.<sup>2</sup> (ECF 6.) In the first action, *Doe v. Goguen*, No. 2:23-CV-2280 (Doc. No. 38) (C.D. Cal. May 22, 2023) ("*Doe I*"), the Central District of California dismissed the 1,700-page complaint based on the following reasons: (1) for lack of subject matter jurisdiction, under Rule 12(h)(3) of the Federal Rules of Civil Procedure; (2) for seeking monetary damages against individuals who are immune from such relief, under 28

<sup>1</sup> Plaintiff included private financial information in the exhibits attached to the amended complaint. The Court directed the Clerk of Court to restrict electronic access to those exhibits, under Rule 5.2 of the Federal Rules of Civil Procedure.

<sup>2</sup> The Central District of California restricted electronic access to the pleadings in those actions, and therefore, this Court cannot view those pleadings.



U.S.C. § 1915(e)(2)(B)(iii); (3) as barred under the *Rooker-Feldman* doctrine; (4) for failure to state a claim upon which relief may be granted, under Section 1915(e)(2)(B)(ii); and (5) as frivolous, under Section 1915(e)(2)(B)(i). On June 16, 2023, the Central District of California dismissed the second action, *Doe v. Quinn Emmanuel*, No. 2:23-CV-4723 (Doc. No. 5) (C.D. Cal. June 16, 2023) (“*Doe II*”), as duplicative of *Doe I*. (ECF 6, at 8.) On July 6, 2023, Plaintiff initiated her action in this court.

For the following reasons, the Court transfers this action to the United States District Court for the Central District of California.

### DISCUSSION

Under 28 U.S.C. § 1391(b), a civil action may be brought in

(1) a judicial district in which any defendant resides, if all defendants are residents of the State in which the district is located; (2) a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred . . . ; or (3) if there is no district in which an action may otherwise be brought as provided in this section, any judicial district in which any defendant is subject to the court’s personal jurisdiction with respect to such action.

For venue purposes, a “natural person” resides in the district where the person is domiciled, and an “entity with the capacity to sue and be sued” resides in any judicial district where it is subject to personal jurisdiction with respect to the civil action in question. *See* 28 U.S.C. § 1391(c)(1), (2).

Plaintiff alleges that Defendants violated her rights, but she does not state with specificity where any of the alleged incidents occurred or provide the addresses for any of the named Defendants. Many of the Defendants appear to reside in California, including Sequoia Capital, Doolittle, Rosewood Sand Hill Hotel, and Glaser Weil. Although Plaintiff does name the *New York Post*, *New York* magazine, MSNBC, Vox Media, and law firms with offices in New York, all of the Defendants in this action do not reside in New York. Thus, it does not appear that venue

would be proper in this District under Section 1391(b)(1). Venue also does not appear to be proper in this District under Section 1391(b)(2). Plaintiff only references incidents that occurred in California, Canada, and Texas; she does not state any facts suggesting that an incident occurred in a county within this District. Accordingly, it is does not appear that this District is a proper venue for this action.

Even if this District were a proper venue, a court may transfer a case to any other district where it might have been brought “[f]or the convenience of parties and witnesses, in the interest of justice.” 28 U.S.C. § 1404(a). In determining whether transfer is appropriate, courts consider the following ten factors: (1) the convenience of witnesses; (2) the convenience of the parties; (3) the locus of operative facts; (4) the availability of process to compel the attendance of the unwilling witnesses; (5) the location of relevant documents and the relative ease of access to sources of proof; (6) the relative means of the parties; (7) the forum’s familiarity with the governing law; (8) the weight accorded to the plaintiff’s choice of forum; (9) trial efficiency; and (10) the interest of justice, based on the totality of circumstances. *Keitt v. N.Y. City*, 882 F. Supp. 2d 412, 459-60 (S.D.N.Y. 2011); *see also N.Y. Marine and Gen. Ins. Co. v. LaFarge No. Am., Inc.*, 599 F.3d 102, 112 (2d Cir. 2010) (setting forth similar factors).

A plaintiff’s choice of forum is accorded less deference where the plaintiff does not reside in the chosen forum and the operative events did not occur there. *See Irigorri v. United Tech. Corp.*, 274 F.3d 65, 72 (2d Cir. 2001).

Under Section 1404(a), transfer appears to be appropriate in this case. First, the underlying events occurred in California, where many of the Defendants reside. Although it is not clear that all of those events occurred within a county located in the Central District of California, the complaint suggests that some of the events occurred within that district. Second,

Defendant Quinn Emmanuel’s letter to the Court indicates that this action is substantially similar to the allegations set forth in *Does I* and *II*. As noted above, the allegations in those actions are not available to this Court, because the Central District of California restricted electronic access to the pleadings filed in those actions. Thus, at this stage, this Court cannot view the pleadings in *Does I* and *II*, and therefore, the Central District of California is better positioned to consider the similarities between the three actions, and whether this new pleading is duplicative of *Does I* and *II*. Finally, Plaintiff’s choice of forum is given less deference here because she does not reside in a county within this District. *See Iraborri*, 274 F.3d at 72.

The Court finds that the Central District of California to be a more convenient forum for this action. Accordingly, the Court transfers this action to the United States District Court for the Central District of California. 28 U.S.C. § 1404(a); *see D.H. Blair & Co. v. Gottdiener*, 462 F.3d 95, 106 (2d Cir. 2006) (“District courts have broad discretion in making determinations of convenience under Section 1404(a) and notions of convenience and fairness are considered on a case-by-case basis.”).

### CONCLUSION

The Clerk of Court is directed to transfer this action to the United States District Court for the Central District of California. Summonses shall not issue from this Court. This order closes this case. All motions filed in this case should be terminated.

The Court certifies, under 28 U.S.C. § 1915(a)(3), that any appeal from this order would not be taken in good faith, and therefore IFP status is denied for the purpose of an appeal. *See Coppedge v. United States*, 369 U.S. 438, 444-45 (1962).

SO ORDERED.

Dated: August 1, 2023  
New York, New York

/s/ Laura Taylor Swain  
\_\_\_\_\_  
LAURA TAYLOR SWAIN  
Chief United States District Judge

AMBER DOE  
Self Represented  
Propia Persona  
8306 WILSHIRE BLVD  
#2020  
LOS ANGELES  
CALIFORNIA, 90211  
424-379-3619

DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF NEW YORK

Amber Doe

Plaintiff

vs.

Sequoia Capital Micheal Goguen New York Post,  
Vox Media, MSNBC, Rosewood Hotels, Quinn  
Emanuel, GlaserWeil, Wilson Sonsini Goodrich  
and Rosati, Goodwin Procter, New York  
Magazine, Nemeke and Cole, Paoli and Purdy,  
Charbonneau and Brown, Bisnar Chase,  
Sherman Law

Defendants.

Case No. 1:23-CV-05881-LTS

**Amended OPPOSITION TO ORDER to  
Transfer Case to California**

TO THE COURT, ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff, AMBER herein submit their opposition to Order Transfer Made Made By Honorable  
Chief Judge Laura Taylor Swain on August 1, 2023 This opposition shall be based on this opposition,

1 the attached memorandum of points and authorities, and Exhibits 1, 2 ,3 attached thereto,  
2 concurrently filed and served herewith, the records and files of this action and on such other oral  
3 and/or documentary evidence as may be presented at the hearing on the order to show cause. Amber  
4 Consents to The Honorable Chief Judge Laura Taylor Swain remaining my Judge through to the end  
5 of my Human Trafficking Trial.  
6

7 I object to my case Being transferred back to California District Court as I exert that I have been  
8 deprived of all of my human rights, constitutional rights and Civil rights by over a dozen Judges  
9 acting under the color of the law.  
10

11  
12 The California lawyers are married to judges have relationships with judges the judge that allowed  
13 them to have a fake trial without me, allowed the lawyers to enter in fake evidence and a Hollywood  
14 film from the 1980s with no relevance to the case it was played in court for no valid reason. There  
15 were no witnesses in court at the FAKE trial, The defendant perjured himself on the stand and prior to  
16 that in his depositions and his lawyers suborned the perjury. The lawyers paid witnesses for fake  
17 testimony, The defense lawyers bribed my lawyers to abandon my case at secret meeting is Las  
18 Vegas. The lawyers had complete control of the Court appointed referee who was completely biased  
19 and prejudiced and ruled against me every except for the witness tampering motion.  
20  
21  
22

23  
24 I filed my cases against everyone involved in my trafficking, rape, stalking, sexual exploitation,  
25 child pornography the. lawyers, judges that are depriving me of my life and hiring male investigators  
26 to stalk me earlier this year.  
27  
28

1 In the case filed in District court in California Quinn Emanuel lawyers immediately began  
2 tampering With The District Judges assigned to my case. I never had a single hearing and the judges  
3 signed document after document when I was never given notice of anything being filed by the Quinn  
4 Emanuel lawyers.  
5

6  
7 The very same lawyers that made me fire my original lawyer and that then forced me to sign the  
8 settlement agreement they wrote for their client and then very same lawyers sued me for extorting  
9 their serial rapist client who has multiple settlement agreements with his victims.  
10

11  
12 In the case I filed in California District Court the Judge Maame Frimpong and Judge Steve Kim  
13 continue to deprive me of my right to a fair trial against any of my abusers based on their exertion  
14 that the judges that deprived me of my rights while acting under the color of the law in the State court  
15 are immune even if they are corrupt.  
16

17  
18  
19 The law allows for me to sue the government for the judges impropriety, I am no longer suing the  
20 judges I am only suing the lawyers and the rapist and owner of one sex trafficking conspiracy.  
21

22  
23 I have attached in the Exhibits exhibit a the list of defendants in the case I filed in California  
24 against every person and company involved in my Trafficking.  
25  
26  
27  
28

1 I am afraid to sue the organized crime syndicate that started trafficking me as a minor because I  
2 know they will kill me immediately. I took out all of the other defendants and left only the lead  
3 defendants so I can have my trial sooner which should have already taken place 9 years ago.  
4

5  
6 The District Court of Southern New York is the proper jurisdiction because I was trafficked to New  
7 York. I lived in New York for some of the time I was stalked By Michael Goguen, his lawyers,  
8 investigators and henchmen in New work, the settlement agreement states Goguen will not come with  
9 a certain distance of my home in New York.  
10

11  
12 I do not live in New York now because of everything that has happened I have to remain homeless  
13 until I have my trial and become emancipated once and for all. I have no other option to save my life  
14 and become liberated from my life of human trafficking other than proceed to trial on the merits of  
15 my case.  
16

17  
18  
19 I remain in grave danger every day due to all of the crimes committed against me and Quinn  
20 Emanuel instance that they had to trespass upon the International organized crime syndicate that  
21 trafficked me inciting threats against my life and more stalking.  
22

23  
24 Even when I was trafficked I was not homeless they paid for shelter for us with the money they  
25 forced us to earn and stole from us.  
26  
27  
28



1 Because of the malice in this litigation I have been forced into homelessness in this major city and  
2 it is not safe. The shelters are full and they have no spaces for women with out children. This is why  
3 people remain trafficked because their options are limited in getting to safety there is nowhere to turn.  
4

5  
6 Not only did the Rapist and his lawyers destroy my ability to live safely in America they deprived  
7 me of my rights in Canada through acting fraudulently in concert with Madame Justice Gilmore who  
8 made a sweeping Injunction which deprived me of all ability to have a bank account, to earn money  
9 to have credit to pay for life saving surgery. Goguens lawyers and Co-conspirators in Canada had  
10 illegal ex-parte communications in writing to the banks lawyers to illegally obtain my private  
11 banking information. Quinn Emanuel also Illegally obtained my phone and other electronic records.  
12  
13

14  
15 Justice Gilmore did all of this is in a jurisdiction where I have never lived, had a bank account nor  
16 any assets. Justice Gilmore is partners in the law firm of the lawyer who brought the case before the  
17 commercial court where Justice Gilmore sits on the bench. The partner Monique Jilleson at the  
18 Lawfirm that brought the case before her runs the commercial list court which is completely  
19 incestuous and a further perversion of the justice system. Without a trial I will die and never ever  
20 become emancipated. Justice Gilmore directly profited from having this brought before her court.  
21  
22

23  
24 The District Court of Southern New York has jurisdiction over my case Several of the defendants  
25 have offices in New York, Rosewood hotels is in New York, The New York Post, MSNBC, Vox  
26 Media and New York Magazine who have exploited my life and defamed me by egregiously printing  
27  
28

1 that I am a racist , the news outlets contacted people involved in my trafficking and further  
2 endangered my life.

3  
4  
5 These lawyers have hundreds of lawyers in their firms in New York and can afford to go to the trial  
6 in New York Goguen is a billionaire, Sequoia capital is a multibillion dollar enterprise these people  
7 are all in the top one percent of people in this country and they are all participants in my trafficking  
8 so they can afford to go to the court for trial in New York.

9  
10  
11 Jeffery Epstein and Harvey Weinstein were named defendants in the case I filed in California and  
12 there were residents of New York and can be sued in New York Jeffery Epsteins estate is in New  
13 York. New York and they both did mean things to me in New York.

14  
15  
16 I could not be present for the FAKE trial where Judge Danny Chao allowed the lawyers to have a  
17 trial with no jury no plaintiff no defense lawyers after I went to the court and filed an ex-parte motion  
18 to continue the trial because I had no ability after major surgery to represent myself and would have  
19 been barred form testify in such a condition, I had two broken bones unhealed with metal drilled into  
20 them was having seizures had a bone marrow transplant and was taking very mind altering  
21 prescription medication to prevent my body from shutting down.

22  
23  
24  
25 The judge denied my request for a continuance with the experts and surgeons declarations  
26 submitted to him and then the next judge signed my life away and forever indentured me To Michael  
27 Lewis Goguen a serial rapist and owner of a sex trafficking conspiracy where he exploited 5000  
28

1 women and girls. Goguen raped me and tore a hole in my body. Goguen intentionally infected me  
2 with HPV, he used dozens of his victims to set up companies so he could evade paying taxes  
3 unbeknownst to any of us. I have spoken to many of Goguens other victims since My breach of  
4 contract case was filed I have never met the other victims.  
5

6 Goguen has multiple white shoe law firms covering up his criminal activity and Goguen Sex  
7 Enterprises. I have no lawyers because Goguen paid them to abandon my case one after another. All  
8 of this oppression of my life was designed By Sequoia Capital Michael Michael Goguen and their  
9 malicious law firms to forever silence me about the sex trafficking conspiracy.  
10

11  
12 At the time of the Fake trial as I had just had surgery and had two shattered bones from injuries I  
13 sustained from Goguens investigators chasing me relentlessly at the time of the fake trial against on  
14 defendant in the instant case for breach of contract I was taking over a dozen prescribed medications  
15 I had two shattered bones I had a bone marrow transplant and was experiencing seizures. All of those  
16 conditions would prevent me from giving legitimate testimony under oath let alone representing my  
17 self in a trial after the defendant and His counsel bribed and paid my lawyers to abandon my case.  
18  
19

20  
21 What has happened to my life should never happen to any person again as long as my case is in  
22 California I will continue to be deprived of my life. All people including slaves have the right to a  
23 trial by jury.  
24  
25  
26  
27  
28

1 I am a modern day slave exploited in every way by everybody. Modern day slavery is rampant  
2 and growing everyday in America and globally because things that happen to people like me are  
3 covered up and hidden.

4  
5 People like me are silenced by our traffickers and abusers so trafficking can flourish. I have not  
6 had one day of my life to live on my terms since Shortly before 15th birthday. I have now been  
7 exploited, abused, beaten, raped, sold, bought by somebody and for the last 9.5 years these criminal  
8 lawyers are using me as currency amongst themselves. For 9 years these lawyers have deprived me of  
9 my right to a jury trial and have cases where I am a plaintiff defendant or witness taking place and  
10 refuse to serve me the pleadings.  
11

12  
13  
14 Quinn Emanuel act as a mafia of lawyers with zero ethics if they are allowed to continue to violate  
15 laws force plaintiffs who are victims of crimes to fire their solo practitioner lawyer and then stalk the  
16 victim all of the victims friends , family members and everyone they think she may have spoken to in  
17 her life time.

18  
19 If Quinn Emanuel are allowed to continue to obstruct the course of justice in both the civil and  
20 criminal justice systems the United States Constitution will continue to be invalidated. All victims of  
21 trafficking, child molestation ,rape and other crimes would not be able to bring a lawsuit against their  
22 traffickers because the lawyers are going to prevail in crated new case law that states victims can not  
23 bring cases against their abusers because the abusers could be “defamed’ at trial.

24  
25 This is unconstitutional and disregards the rule of due process the pillar upon which the American  
26 justice system is built.  
27  
28

1 I have always had a right to a fair trial and must not be deprived that right any longer just because  
2 the sexual predators in the case will be “defamed” .  
3

4  
5 Please don't send my case back to California just so they can tell me I am not a person with rights  
6 and that I should be exploited by the lawyers for another 9 years and indentured in the second case  
7 where the lawyers are suing me for the the defendant forcing me to fire my first lawyer and they  
8 refuse to serve me the legal documents pleadings court dates the judge is allowing this to happen  
9 subsequently I will be further indebted for 100,000,000.00 USD dollars more to the lawyers.  
10

11  
12 I want to have my trial in New York where I will not be deprived of my right to a trial by the  
13 judges and if I can not I want to remove if from Southern District Of New York to the Supreme Court  
14 of the United States. I do not want anybody to ever tell me again that I am not even a human being in  
15 the eyes of the court and that I can not have a trial on the merits of my case.  
16  
17

18  
19 I respectfully submit this opposition to the transfer of my case and ask to proceed to trial in New  
20 York.  
21

## 22 MEMORANDUM OF POINTS AND AUTHORITIES

### 23 I.

#### 24 STATEMENT OF FACTS

25 This case arises out of: **A dispute over a contract that Amber signed at the coercion and**  
26 **threats of defendant and instructions of his lawyers at Quinn Emanuel LLP, Wilson Sonsini**  
27  
28

1 **Goodrich and Rosati and Goodwin Procter Law firms. Plaintiff had no independent legal**  
2 **advice and was told the rapist himself and his lawyers could represent her. payoff had not**  
3 **knowledge to the contrary.**

4  
5  
6 **Amber was told the lawyer she met briefly in a coffee shop and retained to represent her who**  
7 **said he was a specialist in representing rape victims, so she could have medical treatment for**  
8 **damages caused to her by the sexual predator who was stalking Amber**

9  
10  
11 **After Goguen received communication from the lawyer Goguen told Amber that her solo**  
12 **practitioner lawyer was a criminal that he would harm her, stalk her and steal all of her money**  
13 **and she would not have any medical treatment.**

14  
15  
16 **Plaintiff had been under Goguens emotional control and after all of his manipulation she did**  
17 **what Goguen instructed her to do and fired her lawyer using the language Goguen and his**  
18 **lawyers told her to use.**

19  
20  
21 **Goguen a billionaire with the most powerful law firms in the country interfered with Ambers**  
22 **Lawyer so they could get her into a position of Pro Se and deprive her of her right to a jury**  
23 **trial on the merits of her case.**

24  
25  
26 **More than nine years after Amber signed the personal injury settlement agreement Goguen**  
27 **has stalked her and threatened her relentlessly with the use of multiple third party men.**  
28

1  
2 **At the date of this filing plaintiff still has been deprived of a trial in all jurisdictions through**  
3 **this malicious conspiracy.**  
4

5  
6 **Defendant and is lawyers and their agents will never relent until they to kill Amber. A dispute**  
7 **over a contract that Amber signed at the coercion and threats of defendant and instructions of**  
8 **his lawyers at Quinn Emanuel LLP, Wilson Sonsini Goodrich and Rosati and Goodwin Procter**  
9 **Law firms. Plaintiff had no independent legal advice and was told the rapist himself and his**  
10 **lawyers could represent her plaintiff had no knowledge to the contrary.**  
11  
12

13  
14 **Amber was told the lawyer she met briefly in a coffee shop and retained to represent her who**  
15 **said he was a specialist in representing rape victims, so she could have medical treatment for**  
16 **damages caused to her by the sexual predator who was stalking Amber**  
17  
18

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9  
10 **At the date of this filing plaintiff still has been deprived of a trial in all jurisdictions through**  
11 **this malicious conspiracy.**

12  
13  
14 **Defendant and is lawyers and their agents will never relent until they to kill Amber.**

15  
16 “Plaintiff” complaint alleges that: Amber Violated fraudulently procured restraint order to  
17 silence amber about the rape and sex trafficking conspiracy was violated when Amber filed pleadings  
18 in court and emailed law enforcement judges and defense lawyers in cases in which she is a  
19 defendant plaintiff or witness.

20  
21 This is more abuse of the litigation process. Defendant seeks to illegally use the fraudulently  
22 procured restraining order to prevent plaintiff from giving testimony in courts of law, Defense herself  
23 in courts of law enter evident as a witness in cases in courts of law and to prevent her reporting  
24 crimes being committed against her self and others to law enforcement. If anybody should be in Jail it  
25 should e Michael Lewis Goguen for his sex trafficking conspiracy, Rape, Pedophilia, Tax Evasion  
26 scheme, Stalking, Perjury, conspiracy to obstruct justice globally, interference with law enforcement  
27  
28



1 and the CIA and his lawyer Diane Doolittle for her willful criminal misconduct. MICHAEL  
2 LEWIS GOGEN AND HIS MAFIA OF LAWYERS filed an ex parte application requesting an order  
3 to show cause directing AMBER (hereinafter ‘AMBER’), to appear personally before the Court and  
4 show cause why they should not be held in contempt for violating the Temporary Restraining Order  
5 ((hereinafter, the “TRO”) entered against them on May 18 , 2020. The Court granted the request and  
6 issued an order to show cause.  
7

8 Defendant/Plaintiff Amber contends that she has not violated the TRO and has signed a  
9 declaration under penalty of perjury in support of her opposition. The declarations unequivocally  
10 show that Defendant AMBER did not violate the ILEGAL FRAUDULENTLY PROCURED  
11 THROUGH BRIBERY AND EXTRINSIC FRAUD UPON THE COURT Temporary Restraining  
12 Order. Plaintiff is in need of a restraining order to prevent Goguen and his beastly lawyers from  
13 stalking her and soliciting her murder repeatedly.  
14

15 See the declaration of Amber Doe concurrently filed and served herewith and incorporated herein by  
16 reference.  
17

18 AMBER contends that the Court should refuse to hold her in contempt on the grounds that  
19 MICHAEL LEWIS GOGUEN DIANE DOOLITTLE QUINN EMANUEL GOODWIN PROCTER  
20 WILSON SONSI GOODRICH AND ROSATI THREATENED PLAINTIFF A VICTIM OF  
21 HUMAN TRAFFICKING WITH NO LEGAL EDUCATION INTO FIRING HER SOLO  
22 PRACTITIONER LAWYER BY TELLING HER THE LAWYER WAS STALKING HER, WOULD  
23 HARM HER, STEAL HER MONEY AND AMBER WOULD NOT RECEIVE MEDICAL CARE  
24 FOR HER INJURIES OF SHE DID NOT SIGN THE LEGALLY BINDING SETTLEMENT  
25 AGREEMENT PREPARED BY GOGUENS MADIA OF LAWYERS. AMBER NEVER  
26  
27  
28

1 EXTORTED GOGUEN A LAWYER SENT HIM A DEMAND LETTER OFFERING MEDIATION  
2 PRIOR TO FILING A LAWSUIT FOR HER DAMAGES. THERE WERE NO THREATS TO GO  
3 TO THE POLICE OR TREATS OF ANY TYPE. GOGUEN KNEWS THAT HE WAS NEVER  
4 EXTORTED AND STARTED THIS WHO DIABOLICAL DESTRUCTION OF AMBERS LIFE  
5 WHEN SHE TOLD HIM THAT UNDER NO CIRCUMSTANCES NO MATTER HOW MUCH HE  
6 PAID COULD HE EVER FORCEFULLY SODOMIZE HER AGAIN.

7  
8 GOGUEN AND HIS CRIMAL LAWYERS HAVE BRIBED JUDGES AND THE COURT  
9 APPOINTED REFEREE LEADING TO PLAINTIFF BEING RELENTLESSLY STALKED,  
10 DEPRIVED OF ALL HUMAN RIGHTS, CIVIL RIGHTS AND CONSTITUTIONAL RIGHTS.  
11 SUBSEQUENTLY LEAVING HER HOMELESS, WITHOUT FOOD SAFTEY OR MEDICAL  
12 TREATMENT THROUGH THEIR CONSTANT AND WILLFUL MISCONDUCT AND  
13 CONSPIRING TO OBSTRUCT JUSTICE IN MULTIPLE JURISDICTIONS AND COUNTRIES  
14 GOGUEN HAS FAILED. AMBER IS AN EXTREMELY BEAUTIFUL YOUNG WOMEN AND  
15 IS NOW BEING STALKED BY SO MANY PERVERTS SHE CANT COUNT THEM BECAUSE  
16 GOGUEN THE PSYCHOPATH AND HIS SIDECK THE THE FEMALE PSYCHOPATH DIANE  
17 DOOLITTLE CONSPIRED TOGETHER TO DEPRIVE PLAINTIFF OF A LAWYER. PLAINTIFF  
18 WAS TRAFFICKED AS A MINOR HAS NO FORMAL EDUCATION GOGUEN PREYS UPON  
19 THE MOST MARGINALIZED GIRLS IN SOCIETY AND ABUSES THEM SEXUALLY. DIANE  
20 DOOLITTLE HABITUALLY REPRESENTS RICH SERIAL RAPISTS AND PURPORTS THAT  
21 OTHER FEMALES HAVE NO RIGHT OF THE COURT OR ITS EXTORTION ALTHOUGH  
22 SHE(Diane Doolittle) HERSELF HAS FILED PERSONAL INJURY CASES FOR HER OWN  
23 INJURIES IN THE SAN MATEO COUNTY COURT AND THAT ISN'T EXTORTION.  
24  
25  
26  
27  
28

1  
2 DEFENDANT GOGUEN REMAINS AN UNATTRACTIVE DIRTY OLD MAN WHO  
3 CONTINUES TO POSSESS CHILD PORNOGRAPHY AND WILL NOT LET GO OF HIS SICK  
4 SEXUAL OBSESSION WITH PLAINTIFF. GOGUEN TOLD PLAINTIFF MANY TIMES THAT  
5 IF SHE EVERY CUT TIES WITH HIM, HE WOULD HIRE MEN TO FOLLOW HER  
6 EVERYWHERE SHE GOES. HE DID EVEN WORSE THAN THAT IN GIVING HER IMAGES  
7 TO ALL OF THESE DIRTY OLD PERVERTS TO DISSEMINATE AND CHASE PLAINTIFF  
8 EVERYWHERE SHE GOES.  
9  
10

11  
12  
13 TO meet the burden of proving their guilt beyond a reasonable doubt in that GOGUEN HAS failed  
14 to submit competent evidence that would support a finding that they willfully violated the TRO,  
15 which is an essential element of a finding of contempt AS AMBER ONLY SUBMITTED  
16 EVIDENCE OF GOGUEN AND HIS LAWYERS CRIMINAL MIS-CONDUCT TO JUDGES, LAW  
17 ENFORCEMENT AND DEFENSE LAWYERS IN CASES IN WHICH AMBER IS A  
18 DEFENDANT A PLAINTIFF OR A WITNESS. GOGUEN HAS FAILED TO MEET THE THREE  
19 PART TEST.  
20

21  
22 PLAINTIFF/DEFENDANT DID NOT DISSEMINATE THE EVIDENCE TO THE NEWS LIKE  
23 GOGUEN THE OWNER OF SEX TRAFFICKING ENTERPRISES AND HIS CRIMINAL  
24 LAWYERS. THE LAWYERS AND GOGUEN SOLD IMAGES OF AMBER TO THE WORLD  
25 WIDE NEWS. THEY ILLEGALLY PURCHASED IMAGES OF AMBER WHICH SHE IS THE  
26 SOLE COPY WRITE OWNER OF ARE THE LAWYERS GOGUEN HIS EMPLOYEES AGENTS  
27  
28

1 AND "INVESTIGATORS" REMAIN IN POSSESSION OF IMAGES OF PLAINTIFF IN STATES  
2 OF UNDRESS AS A MINOR WHICH IS CHILD PORNOGRAPHY WHICH THE COURT  
3 KNOWS THEY CAN NOT LEGALLY POSSESS BUT ALLOWS THEM TO CONTINUE TO  
4 DAMAGE PLAINTIFF BY DISSEMINATING THE IMAGES.  
5

6  
7 DEFENDANT GOGUEN AND HIS LAWYERS DEFAMED PLAINTIFF BY LYING TO THE  
8 NEWS AND INSTRUCTING THEM TO PRINT THAT PLAINTIFF/DEFENDANT AMBER IS A  
9 RACIST FOR NO APPARENT REASON OTHER THAT HARMING PLAINTIFF AMBER .  
10 GOGUEN BELIEVES HE CAN BRIBE EVERYONE AND THEN WHEN HE GETS CAUGHT  
11 BRIBING LAW ENFORCEMENT HE EITHER HIRES THEM TO WORK FOR HIM  
12 PERSONALLY OR LIES ABOUT HIS INFILTRATION OF LAW ENFORCEMENT ENTITIES  
13 AND HAS OFFICERS STEP DOWN FROM THEIR SERVICE. HIS VICTIMS HAVE BEEN  
14 PUMMELED TIME AND TIME AGAIN BY HIS ABUSE OF PROCESS, BRIBERY THREATS  
15 STALKING AND CONSPIRING TO OBSTRUCT THE CIVIL AND CRIMINAL JUSTICE  
16 SYTEMS. EVEN HIS LAWYERS HAVE REPEATEDLY LIED TO POLICE DETECTIVES  
17 INVESTIGATING CRIMES HE HAS COMMITTED. TO ALLEGE THAT DISCUSSION  
18 COMMUNICATIONS WITH GOVERNMENT AGENCIES, LAW ENFORCEMENT, POLICE  
19 DISTRICT ATTORNEYS, JUDGES, THE DEPARTMENT OF JUSTICE AND DEFENSE  
20 COUNSEL IS A VIOLATION OF THE TRO GAG ORDER IS A FURTHER OBSTRUCTION OF  
21 JUSTICE AND A CRIME AGAINST SOCIETY. THE CONTINUED DENIAL OF AMBERS  
22 HUMAN RIGHTS, CIVIL RIGHTS AND CONSTITUTIONAL RIGHT TO A TRIAL BY JURY IS  
23  
24  
25  
26  
27  
28

1 ALSO A CRIME AGAIST SOCIETY AND AN INVALIDATION OF THE UNITED STATES  
2 CONSTITUTION.

3  
4  
5  
6  
7 PLAINTIFF AMBER also requested that the Court hold a full and fair evidentiary hearing in which  
8 they are allowed to confront and cross-examine all witnesses against them. The Judge Did Not allow  
9 me my right of a full evidentiary hearing when I appeared in Court she Just signed me into further  
10 debt and ordered me to pay \$9000.00 to the court for serving pleadings on defendants and telling  
11 prosecutors, law enforcement, the DA, the judges, the police all of the facts of the cases and the  
12 exploitation of my life.  
13  
14

15  
16 **II.**

17 **LEGAL ARGUMENT**  
18  
19

20 TRUTH IS A 100 PERCENT defense to defamation. The mere fact that Goguen a notorious sex  
21 predator doesn't like to hear the truth does not equate it to defamation.  
22  
23

24 I am suing multiple new outlets for printing images that I am the sole copy right owner of that  
25 Goguens lawyers sold the news and for defaming me and printing that I am racist when I a have  
26 never been a racist nor have I ever Discriminated against anyone and I was born of extremely mixed  
27 heritage so I don't know why the news is printing that I am a racist.  
28

1  
2 **1. I am the plaintiff/DEFENDANT in this action. I am over the age of 18 years and have**  
3  
4 **personal**  
5 **knowledge of the facts stated in this declaration, and if called as a witness, could and would**  
6 **testify competently to the truth of the facts as stated herein.**

7 **2. I make this declaration in support of the foregoing opposition to the order to show cause**  
8 **for contempt issued by the Court on MAY 18, 2023 PLAINTIFF ONLY SUBMITTED**  
9 **EVIDENCE TO LAW ENFORCEMENT, DEPARTMENTS OF GOVERNMENT**  
10 **GOVERNING LAW ENFORCEMENT, DEFENDANTS, LAWYERS FOR DEFENDANTS,**  
11 **THE JUDGES AND COURTS WHICH IS NOT A VIOLATION OF THE ILLEGAL GAG**  
12 **ORDER IN UNDER THE GUISE OF FRAUDULENTLY PROCURED RESTRAINING**  
13 **ORDER SIGNED IN SECRET BY JUDGES DANNY CHAO AND PRESIDING JUDGE**  
14 **ELIZABETH LEE.**

15  
16  
17  
18  
19 **PLAINTIFF DID NOT GIVE THE EVIDENCE OF GOGUENS OBSTRUCTION OF**  
20 **JUSTICE, PERJURY, CRIMINAL MISCONDUCT, INTERFERENCE WITH CRIMINAL**  
21 **AND CIVIL PROCEEDINGS THROUGH TAMPERING WITH LAW ENFORCEMENT AND**  
22 **BRIBING STATE AND FEDERAL JUDGES.**

23  
24 **AMBER PROVIDED THE EVIDENCE PLEADINGS AND COMMUNICATIONS TO**  
25 **BRANCHES OF THE GOVERNMENT LAW ENFORCEMENT, DEFENSE COUNSEL AND**  
26 **THE COURT WHICH SHE CAN NOT BE DEPRIVED OF THE RIGHT TO REPORT**  
27 **CRIMINAL ACTIVITIES.**  
28

## 5 U.S. Code § 3331 - Oath of office

U.S. Code    Notes

[prev](#) | [next](#)

An individual, except the President, elected or appointed to an office of honor or profit in the civil service or uniformed services, shall take the following oath: "I, AB, do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter. So help me God." This section does not affect other oaths required by law.

([Pub. L. 89-554](#), Sept. 6, 1966, [80 Stat. 424](#).)



**HON. HONORABLE ELIZABETH K. LEE**  
**JUVENILE SUPERVISING JUDGE**  
**CALIFORNIA SUPERIOR COURT OF SAN MATEO COUNTY**

Judge Elizabeth K. Lee was appointed to the Superior Court of San Mateo County bench in July of 2005. She is currently Juvenile Supervising Judge assigned to the Juvenile Court in San Mateo County handling both delinquency and dependency matters. She is the Chair of San Mateo County's Blue Ribbon Commission on Foster Care Youth and has worked with other stakeholders in the court system to address the problem of human trafficking of minors. Prior to joining the bench, Lee worked as an Assistant United States Attorney for the United States Attorney's Office in the Northern District of California assigned to the Organized Crime and Racketeering Strike Force. She served as the Deputy Chief of the Strike Force from 1999 – 2005. Judge Lee also worked as an associate for the law firm of Marron, Reid & Sheehy in San Francisco, as an Assistant United States Attorney for the United States Attorney's Office in the District of Columbia, and as a Trial Attorney in the Honors Program for the Department of Justice, Anti-trust Division, in Washington, D.C. Lee earned her J.D. from Columbia University School of Law in 1983, and a B.A. in Economics from the University of California Berkeley in 1979.

Before her election as Secretary to NAWJ's Executive Committee, she served as chair of NAWJ's Human Trafficking Committee.



# LOYALTY OATH

STATE OF CALIFORNIA } s. s.  
COUNTY OF SAN MATEO }

I, \_\_\_\_\_, do solemnly swear (or affirm)  
that I will support and defend the Constitution of the United States and  
the Constitution of the State of California against all enemies, foreign and  
domestic; that I will bear true faith and allegiance to the Constitution of  
the United States and the Constitution of California; that I take this  
obligation freely, without any mental reservation or purpose of evasion; and  
that I will well and faithfully discharge the duties upon which I am about  
to enter.

Witness my hand this.....day of....., 20\_\_

**3. The allegations made by Plaintiffs that I have violated the Temporary Restraining Order  
are false.**

**4. The true facts are that Plaintiff opposes this frivolous motion for contempt brought for  
a second time By Quinn Emanuel the most unethical law firm in the world acting as a mafia for  
all intents and purposed conspiring with a serial rapist and owner of a sex trafficking  
conspiracy Goguen Sex Enterprises.**

1  
2 **THESE** are extremely sick twisted and psychopathic individuals who conspired with Judge  
3 **Danny Chao and Retired Judge Read Ambler from JAMS to pervert the course of justice and**  
4 **deprive plaintiff of her right to a trial by jury.**

5  
6  
7 **Plaintiff was deprived of legal counsel time after time. Defendants KNOW that plaintiff is a**  
8 **victim of human trafficking and suffers from PTSD. Defendant GOGUEN knows he sexually**  
9 **exploited and abused plaintiff and many others. He conspired with his lawyers at all of the most**  
10 **powerful law firms in America to fraudulently induce plaintiff to fire her lawyer and enter into**  
11 **the personal injury settlement agreement that the “lawyers” PREPARED and plaintiff**  
12 **AMBER signed forever extinguishing her rights in exchange for confidentiality and medical**  
13 **treatment for her injuries**  
14 **SUSTAINED WHEN GOGUEN RAPED AND SEXUALLY ABUSED HER and cessation of the**  
15 **stalking by defendant GOGUEN and his agents.**

16  
17  
18  
19  
20 **Defendants lawyers never informed plaintiff that they could or would sue her for extortion**  
21 **after she signed the agreement created by the most unethical law firm in the world. All of their**  
22 **actions are an extension of Michael Goguens prolific abuse of plaintiff.**

23  
24  
25 **The Judges at the San Mateo county court deprived plaintiff of a trial by jury while acting**  
26 **under the color of the law as a branch of the government. Lest we not forget that The judiciary**  
27 **are not personal employees of Micheal Lewis Goguen a notorious sexual predator but that The**  
28

1 **jugged remain appointed by the People of the united sated, are paid for by the people of the**  
2 **united states and are emissaries of justice not to participate in the obstruction of the judicial**  
3 **process.**

4  
5  
6 **The Pillars of the American justice system still remain built upon DUE process.**  
7 **After OVER 9 years of relentless abuse by Quinn Emanuel lawyers and their callous uncaring**  
8 **perversion of the course of justice plaintiff has been deprived of all of her human rights, civil**  
9 **rights, constitutional rights. Plaintiff is still being stalked relentlessly by men hired by Goguen**  
10 **and his agents.**

11  
12  
13  
14  
15 **Defendant and his lawyers remain in possession of child pornography where plaintiff is a minor**  
16 **and was photographed in states of undress.**

17  
18  
19 **The restraining order which is merely an illegally procured document signed by Judges silence**  
20 **plaintiff about this enormity of the corruption involved in the instant case is unconstitutional as**  
21 **plaintiff never had a trial.**

22 **None of the following is STATED anywhere in the United States Constitution**

23  
24  
25 **Plaintiff has no right to a trial by jury**

26 **Plaintiff has no right to a home**

27 **Plaintiff has no right to a bank account**  
28

1                   **Plaintiff has no right to work**

2                   **Plaintiff has no right to safety**

3                   **Plaintiff has no right to peace**

4                   **Plaintiff has no right not to be stalked**

5                   **Plaintiff has no right not to be Murdered**

6                   **Plaintiff has no right to not to be trafficked**

7                   **Plaintiff has no right to surgery**

8                   **Plaintiff has no right to food**

9                   **Plaintiff has no right to report to law enforcement**

10                  **Plaintiff has no right to speak the truth.**

11                  **Plaintiff has no right to life liberty or freedom.**

12  
13  
14  
15  
16  
17                  **it is as standing order that all of these exploiters have the right to exploit plaintiff and live off**  
18                  **of the avails of her sex trafficking SIGNED BY A JUDGE ACTING UNDER THE COLOR OF**  
19                  **THE LAW**

20  
21  
22  
23  
24                  **Judges Danny Chou and Elizabeth Lee signed these documents when plaintiff was blocked**  
25                  **from participating in such hearings and defending herself due to the fact that the debased**  
26                  **lawyers at Quinn Emanuel sent her the incorrect hearing times and dates and no zoom**  
27                  **credentials for the hearing so that they could procure another signature on a document without**  
28

1 plaintiff present so they can deprive plaintiff of her first amendment rights and her right to  
2 speak the truth in a court of law and to law enforcement.  
3

4  
5 After the honorable Danny Chou already ruled at the prior contempt hearing that plaintiffs  
6 communications with the court, defense counsel and law enforcement are protected by the  
7 litigation privilege, Amber is not aware of any changes to the rule of absolute litigation privilege  
8 since the last hearing where defendants deceitful lawyers tried to have her held in contempt for  
9 her communications with their co-conspirators the Canadian judges that own the law firm that  
10 runs the court where one of their partners perverted the course of justice by bringing the  
11 fraudulently procured judgement signed by Danny Chou before her partner at the firm, a  
12 Madame Justice Gilmore , Monique Jilleson's partner in the law firm and Judge in the court in  
13 which Monique somehow a lawyer in private practice runs the government courts commercial  
14 list.  
15  
16  
17  
18

19 This Judge Gilmore sits on the bench in the commercial court a branch of the Canadian  
20 government which is not an arbitration firm yet she received financial compensation for her  
21 ruling in a jurisdiction where AMBER was never a resident and never ever had any assets.  
22

23  
24 YET again GOGUENS lawyers tried to have Amber held in CONTEMPT for her  
25 communications with the defense counsel in these cases where she has no choice but represent  
26 herself because she has been robbed of all her finances, credit cards, bank accounts, AND  
27  
28

1 belongings. AFTER THE judiciary allowed several sets of lawyers to withdraw from her cases  
2 after THEY STOLE hundreds of thousands of dollars from her attorney client trust accounts.

3  
4  
5 Now all of the “lawyers” are using the fact that plaintiff never had a trial and have all joined  
6 hands and the army of lawyers is suing plaintiff who has no money for food shelter medical  
7 treatment or basic life necessities for \$100 million dollars and refuse to serve her any pleadings  
8 in the case.

9  
10  
11 Does anybody else see the problem with all of this incest between the lawyers and the  
12 Judiciary? Because I see a major obstruction of justice and a Quid Pro Quo relationship  
13 between judges and lawyers covering up a sex trafficking conspiracy for a billionaire while his  
14 victims remain oppressed and deprived of the constitutional right of DUE PROCESS UNDER  
15 THE LAW.

16  
17  
18  
19 Defendant and his criminal mafia of lawyers are intent on continuing to subject plaintiff to  
20 every type of harm possible until the date of her death so they can continue lining their pockets  
21 with filthy lucre at plaintiffs expense. these lawyers need to be disbarred so they stop  
22 obstructing justice destroying the integrity of the courts and causing irreparable harm to all  
23 people.

24  
25  
26 What the judges in the instant case have done to plaintiff in depriving her of her right of due  
27 process and allowing a fake trial to move forward without plaintiff and her counsel after  
28

1 plaintiff submitted all relevant evidence to the court that she could not possibly try the case on  
2 her own while enduring two broken bones recently having had surgery and a bone marrow  
3 issue in addition plaintiff was taking over a dozen prescription medications at the time of the  
4  
5 FAKE trial to prevent her body from shutting down. Many of these medications rendered  
6 plaintiff unable to legally testify in a court of law let alone be coherent to bring a case before  
7 the court in pro per. Plaintiff was also experiencing seizures at the time of the fake trial and the  
8  
9 judge denied her request to continue the trial until plaintiff could heal her bones and  
10  
11 competently try the case before a jury.  
12  
13

14 The San Mateo judge improperly denied plaintiffs request to continue the trial.

15 Read Ambler the discovery referee improperly executed terminating sanctions after being  
16 bribed by defendants and subsequently refused to review plaintiffs motion for reconsideration  
17 by fraudulently exerting that he couldn't not review the motion because the surgeons and  
18 psychoanalysts completely readable and coherent declarations that they typed and signed were  
19 "not on legal filing paper" which their is no legal requirement for doctors or 3rd parties to  
20 submit their declarations on legal filing paper.  
21  
22

23  
24 All of this is unconstitutional and remains a deprivation of plaintiffs rights by judges acting  
25 under the color of the law. There are no legal grounds to hold plaintiff in contempt of court as  
26 she is allowed at all times to discuss the crimes against her with lawyers, judges, law  
27 enforcement and to allege otherwise is another criminal deprivation of plaintiffs rights.  
28

1  
2  
3 **Because of Judge Danny Chou’s Judicial corruption and deprivation of plaintiffs rights she**  
4 **remains homeless, without medical care for injuries she sustained as a direct result of**  
5 **defendants abuse. Plaintiff has no right to a be a person not even in a court of law is the**  
6 **message that is being propagated loud and clear by the lawyers and the judges in this case.**  
7  
8

9  
10 **This obstruction of justice it is unconstitutional and in furtherance of all the abused plaintiff**  
11 **has endured the lawyers are suing plaintiff for \$100 million dollars in Orange County in hopes**  
12 **of procuring the illegal signature of another judge in a case where defendants are blocking**  
13 **plaintiffs ability to defend herself by not serving her any pleadings discovery or deposition**  
14 **notices in a case where she is the defendant.**  
15  
16

17 **Plaintiff is already indentured to her sex trafficker for millions of dollars that she does not**  
18 **have under the illegally procured judgement signed by Judge Danny Chou when he knew**  
19 **plaintiff could not stand for trial due to the severity of her health and allowed defendant to**  
20 **perjure himself on the witness stand with Quinn Emanuel LLP Suborning the perjury with no**  
21 **jury present, no cross examination no objections and zero actual witnesses that were not being**  
22 **paid for by Goguen himself, in addition Judge Chou who wrote a book on the California**  
23 **constitution allowed a Hollywood film from the 1980s with zero relevance to the case to be**  
24 **entered into evidence DURING the FAKE TRIAL.**  
25  
26  
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28



1 **Plaintiff demands the abuse of her human life by judges and lawyers through their conspiracy**  
2 **to deprive plaintiff of her right to life cease now and forever and plaintiff proceed to trial on the**  
3 **merits of her case.**

4  
5  
6 **Ordering plaintiff in contempt of court for speaking the troth to law enforcement the court and**  
7 **defense counsel would only be in furtherance of the malicious prosecution of a person who**  
8 **always had the right of a trial by jury under the laws of the United States of America.**  
9

10  
11 **The Judges seek to invalidate the United States of America with their continued obstruction of**  
12 **justice in concert with the Lawyers at Quinn Emanuel.**  
13

14  
15 **Might I remind the Honorable Judges at the San Mateo Court who have abdicated their duties**  
16 **as officers of the court that they took an Oath to office and that the criminal and civil justice**  
17 **systems are not just afforded to the rich, the guilty and the powerful.**  
18

19  
20 **Since Spring 2016 the Judiciary has acted with absolute prejudice ignored the evidence and**  
21 **favorred the white male owner of a sex trafficking ring and has completely dehumanized his**  
22 **victims.**  
23

24  
25 **It is not my duty as the plaintiff to remind the judiciary what the law is. Yet plaintiff with no**  
26 **legal education is forced to tell the court that its job as a branch of the government is to be fair**  
27 **and just to all people.**  
28

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3 **Plaintiff has already made it very clear that if she is ordered into jail for contempt she would**  
4 **be in a safer prison than she is now. Since being deprived of my rights I now have no shelter no**  
5 **food no medical treatment and no protection of law enforcement against my traffickers. In a**  
6 **prison I would have shelter, a bed, food and medical treatment and there is police security**  
7 **prison.**  
8  
9

10  
11 **I implore everyone to ask themselves if covering up the crimes committed by a man trying to**  
12 **infiltrate law enforcement and the CIA to cover up his criminal activities is worth destroying**  
13 **our democracy?**  
14

15  
16 **You might ask yourselves as officers of the court if it is worth throwing out the constitution to**  
17 **cover up the crimes of a sexual predator?**  
18

19  
20 **What has happened to AMBER could happen to any person who is seeking out the help of the**  
21 **court and hopes of a civil resolution to an unjust circumstance.**  
22

23  
24 **Judges are not absolutely “immune” only the judges themselves purport that they are**  
25 **immune of all consequences when they are corrupt.**  
26  
27  
28

1       **Now the entire judicial system has become compromised and WE THE PEOPLE question**  
2       **it's legitimacy.**

5                   **These California judges who are committing criminal acts while in their position and**  
6                   **accepting bribery can be prosecuted and the government held financially accountable for the**  
7                   **damage caused by Rogue Judges.**

10 In addition to everything else Goguen has Done Since plaintiff filed her case in state court for  
11 human trafficking to clean up his public image he Paid money to get on the board of an  
12 evidently corrupt human trafficking charity. This is the same man who owns Goguen sex  
13 enterprises. This is the same man who had sex with minors this is the same man who purchased  
14 me lured me into Goguen sex trafficking raped me and mutilated my body.  
15

17                   **This fake charity Deliver fund is Run By Goguen A sex trafficker, a dirty Cop Shane Erikson**  
18                   **who was fired from the police force for taking bribes to cover up the sex crimes Goguen**  
19                   **Committed. After Erickson was fired Goguen Hired him personally and they teamed up with**  
20                   **Ex CIA Nic McKinley at Deliver Fund Charity so clearly that is not helping Victims of sex**  
21                   **trafficking . These depraved individuals should not be anywhere near a charity that alleges that**  
22                   **are helping trafficking victims.**

24 In addition to that Goguen paid millions of dollars to do “off the books” CIA missions to  
25 another former Police officer.

Goguen once called me and told me that he and his men were responsible for sending in the US forces to get the girls kidnapped by Boko Haram. Mathew Marshall verified that Goguen

believes himself to be doing these missions. I do not think that it is legal for a billionaire sex trafficker to be doing off the books CIA missions. All of the evidence is in the exhibits attached to my amended complaint. I have a full awareness that this sounds out of the ordinary but it is true everything I am stating Goguen did to me and in other areas of his life are true and there are a great many witnesses. The evidence is in the exhibits to my amended complaint the same evidence was part of my complaint in the California central district court but I have not reattached all of the exhibits to this opposition so that the Judge and clerks don't have to read them all again for the sake of this opposition.

I have only attached the words in the other complaint and the statements to disqualify the Judges that are depriving me of my right to a trials I also filed my motion to disqualify them days before they terminated my case for no valid legal reason. In addition to that I filed a motion to disqualify Quinn Emanuel from the cases yet they are now asking the New York Court to deprive me of my right to a trial by jury based on Judge Maame Frimpongs improper deprivation of my right to a trial.

Micheal Goguen by using his lawyers as thugs, he has managed to threaten everyone into silence or have their livelihoods taken away from them by paying law enforcement. I live in fear all day every day of what Goguen and his thugs will do to me next.

Plaintiff Objects to any further malicious prosecution of her person any more delays in her right to a trial by jury and that she has the right to utilize the courts in all jurisdictions where there are defendants and or where the trafficking took place. Plaintiff contends that as soon as she is liberated from this malicious conspiracy that has gone on for 9.5 years amidst the

1 **Lawyers for Micheal Goguen, Sequoia Capital their lawyers and agents and the Judiciary and**  
2 **it will only stop now when my New York Legal proceeding begins after plaintiff proceeds to**  
3 **trial and is liberated she will work the rest of her life to end human trafficking to the best of**  
4 **her ability by “sitting for the law” in California becoming a lawyer and representing all of the**  
5 **girls for free and the boys if they come forward.**

7 **Plaintiff must no longer be silenced about the crimes committed against her anywhere on this**  
8 **planet. Plaintiff must be reinstated as a human being. And she can only do this by having a fair**  
9 **trial with a fair judge who is not being paid by defendant and his lawyers. . Plaintiff kindly**  
10 **requests that her Fee waiver and Summons be issued by Chief Judge Laura Taylor Swain**  
11 **thereafter at the soonest possible time that she is able plaintiff will pay back the New York**  
12 **Southern District court for her Court fees that she can not pay now because she is indigent.**

### 15 **III.**

### 16 **CONCLUSION**

17 Based on the foregoing, AMBER, requests that the Southern District of New York Remain the  
18 Jurisdiction of her trial and that Chief Judge Laura Taylor Swain Remain appointed Judge in case  
19 1:23-CV-05881-LTS Plaintiff promises that once her case is set for trial she will create shorter  
20 motions and pleading as to not overwhelm the court attached you will see the first pages of what was  
21 filed in The Central district court in California I removed everyone except the lead defendant and  
22 everyone involved in the last nine years and I am no longer suing The Government the state or the  
23 judges I am only suing The rapist, His companies, The hotel where I was raped and trafficked the last  
24 time his lawyers, my former lawyers that accepted bribes and the investigators that will not cease  
25 stalking me. I attached the evidence on my Amended complaint because I would like the Judge to  
26  
27  
28

1 have a fair review of everything that has happened to plaintiff this far and will continue to happen if  
2 no judge allows her to proceed to trial by jury. Plaintiff apologized for any and all grammar errors  
3 when she submitted this document earlier. I have Complex PTSD and have to write so many legal  
4 documents quickly while trying to find safety.  
5

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7 Thank you I respectfully submit my request to this court. In service of a better humanity  
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Amber.

Dated August 7th, 2023

*Amber Doe*

Amber Doe

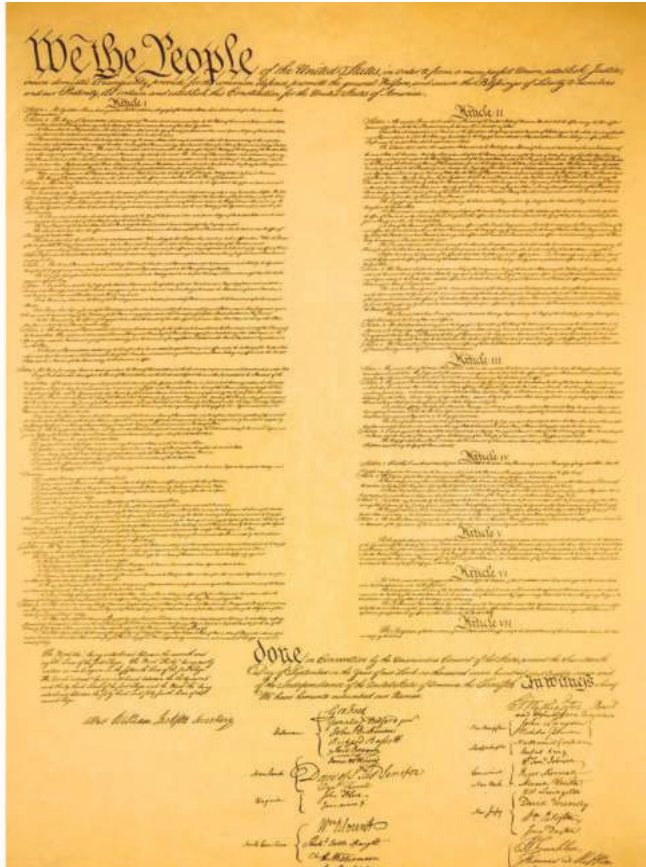
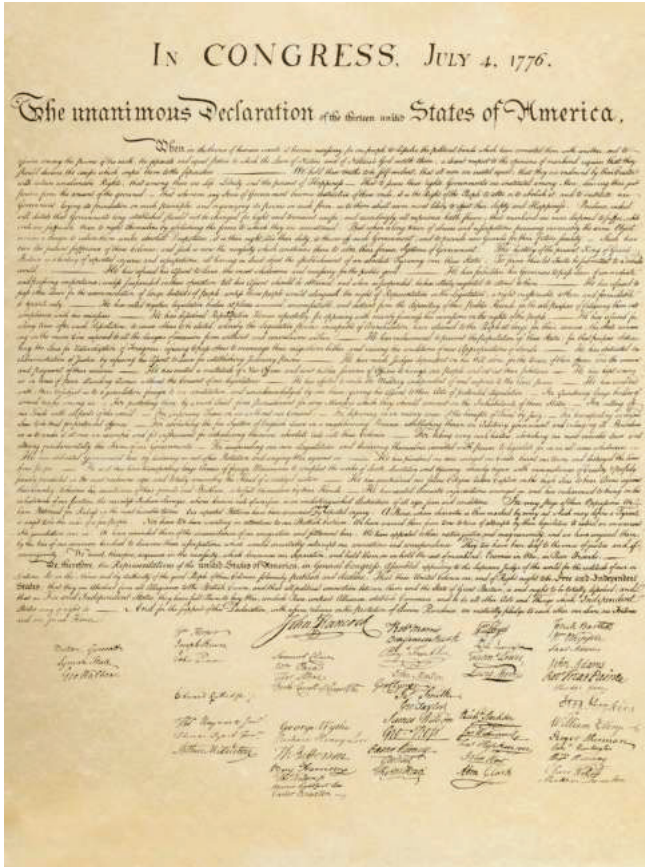
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FILED  
CLERK, U.S. DISTRICT COURT  
3/28/23  
CENTRAL DISTRICT OF CALIFORNIA  
BY: CS DEPUTY

Amber Doe  
P.O. Box 20  
8306 Wilshire Blvd.  
Los Angeles, CA 90211  
Phone 424- 379- 3619  
Amberlitigate@gmail.com  
Propia Persona

CV23-2280-MEMF(SK)

UNITED STATES DISTRICT COURT  
DISTRICT OF  
Los Angeles  
For removal to The Supreme Court of the United States  
Writ of Certiorari In Preparation







1	Amber Doe	) COMPLAINT FOR
2	VS	)
3	MICHAEL LEWIS GOGUEN	) 1. HUMAN TRAFFICKING
4	SEQUOIA CAPITAL	) 2.RAPE
5	TWO BEAR CAPITAL	) 3.TORTURE
6	DIANE M DOOLITTLE	) 4 .PREMISES LIABILITY
7	QUINN EMANUEL LLP	) 5.18 U.S. Code § 242 - Deprivation of rights
8	Rosewood Sand Hill	) under color of law
9	The UNITED STATES OF AMERICA	) 6.Breach of Written Contract
10	The STATE OF CALIFORNIA	) 7 . Violation of Human Rights act
11	HUMAN TRAFFICKERS (THE GANG)	) 8.Violation of the Man act
12	STRIP CLUBS	) 9. Violation of the Mann act
13	MODEL STUDIOS	) 10.Violation of the civil rights act 1964
14	HON DANNY CHAO Lawyer/Judge	) 11.Violation Of the Bane Act
15	Hon Read Ambler/Lawyer	12.Violation of Violence Against Women Act
16	Hon Elizebeth Lee Judge/Lawyer	13.Peonage and slavery
17	The San Mateo County Court	14.Importation of an alien for immoral use
18	The San Mateo County Sheriffs	15.Forgery or false use of passport
19	The WhiteFish Police Department	16.Fraud and misuse of visas, permits, and other documents
20	The City Of Whitefish Montana	17.Mail and wire fraud
21	Orange County	18.Breach of covenant
22	Orange County Court	19.Breach of Oral contracts
23	San Mateo County	20. Civil and Criminal Extortion
24	HON JONATHAN CANNON Judge/Lawyer	21.Possession and Distribution of Child Pornography
25	HON RICHARD DUBOIS Judge/Lawyer	22. Extortion
26	Hon. Nico A. Dourbetas Judge/Lawyer	23.False Claims Qui Tam
27	Wilson sonsini Goodrich & rosati	24. Sexual Harassment Quid Pro Quo
28		25.Fraud in connection with identification
		26. Violation of 42 USC §1983

1 Goodwin Procter  
2 Glaser Weil  
3 Bruce Eric Van Dalsem Lawyer

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1	Glaser Weil LLP	)	27. Racketeering and Civil Rico
		)	
2	ANTHONY McCusker Lawyer	)	28. Intentional Violations of FLSA
		)	
3	Patricia Glaser Lawyer	)	29. Fraud Upon the Court
		)	
4	Jill Basinger Lawyer	)	30. Bribery of the Judiciary
		)	
5	William Paoli Lawyer/Judge	)	31.Bribery Of law Enforcement
		)	
6	Ryan Baker Lawyer	)	32.Tampering with witnesses
		)	
7	Michael Strickland Lawyer	)	33. Tampering and destruction of Evidence
		)	
8	All Private Investigators hired to Stalk Amber since		34. 11 years of stalking
9	2012		35.Stalking by alternative means
10	Brian Nash		36.Gender Violence
11	Michael Feenberg Lawyer		37.Violation of the equal rights Amendment
12	Michael McCarthy Lawyer		38.Victims of Crime Act
13	Mark Schaeffer Lawyer		39. Vicarious liability; respondeat superior
14	All men solicited for Ambers Murder		40. Breach Of fiduciary Duty
15	Michael F Grady Lawyer		41.Legal Malpractice
16	Bruce Eric Van Dalsem Lawyer		42. Assault and Battery
17	Yvette Van Dalsem Lawyer/Judge		43.Negligent and Infliction of Emotional
18	John Quinn Lawyer		44.Intentional Infliction of distress
19	Kathleen Sullivan Lawyer		45.Ku Klux Klan Act Violations
20	Christopher Tayback Lawyer		46.Personal Injury
21	William C. Price Lawyer/State prosecutor		47.Violation of Fair Labor Standards Act
22	Mark Holsher Lawyer		48.Violation of the Alien Tort Statute
23	Hon Robert D Folies Jodge/Lawyer		49.Negligent infliction of emotional distress
24	Hon Scott, Joseph C. Judge/Lawyer		50.Intentional infliction of emotional distress
25	Hon Weiner, Marie S. Judge/Lawyer		51. Racial discrimination
26	Hon Foiles, Robert D Judge/Lawyer		
27	Hon. Leland Davis III Judge/Lawyer		
28	SUONG NGUYEN Lawyer		

JOSEPH C. SARLES Lawyer

Robert Shapiro Lawyer

1	Dr Ina Park	) 52 Violation Of The Womens Rights Act
		)
2	Hon Karesh, Jonathan E.Judge/Lawyer	) 53.Unfair competition
		)
3	Hon Buchwald, Gerald J.Judge/Lawyer	) 54.Fair Debt Collection Practices Act
		)
4	Dr. Tara Collins	) 55. Perjury And Suborning Perjury
		)
5	Hon. Grandsaert, John L. Judge/Lawyer	) 56.Violation of Trafficking Victims Protection Act
		)
6	JUDGE DYLINEA Lawyer	) 57.Breach of implied warranties and warranties of
		)
7	Megan M Kerr Lawyer	) fitness;
		)
8	PATRICK DOOLITTLE Lawyer	58.Breach of implied covenant of good faith and
9	Margaret Caruso Lawyer	fair dealing;
10	MICHAEL LIFRAK Lawyer	59.False imprisonment
11	Sara Pollack Lawyer	60.fraudulent inducement of Amber
12	David Klein Lawyer	61.Fraudulent Inducement of Judiciary
13	KIRKLAND & ELLIS LLP	62.fraudulent misrepresentation
14	Jamie Stephenson Defamation	63.fraudulent transfer
15	Aida TAKYRBASHEVA Defamation	64.Negligence
16	Fawn Cheree Madonia/ Harassment Defamation	65.negligence per se
17	Negar Sherazi Defamation	66.negligent hiring
18	Marcella Williams Defamation	67.Negligent Retention
19	Inga PopKova Defamation	68.Negligent Supervision Of M L.Goguen
20	RIVERS J. MORRELL III THE LAW OFFICERS	69.Negligent Supervision of Lawyers by the State
21	OF RIVERS J. MORRELL	Bar
22	FRANK W. NEMECEK (62260) Lawyer	70.Negligent Supervision Of Diane Doolittle
23	JONATHAN B. COLE	71.Negligent Supervision of Judges
24	MARSHALL R. COLE	72.Negligent Direction
25	MICHAEL W. FEENBERG	73.Negligent Misrepresentation
26	MICHAEL MCCARTHY	74.Civil Conspiracy
27	JOSEPH W. SCOTT	75.Criminal Conspiracy
28	Alex Gerbi	76.Concealment

1	Ted Greeno	77.Deceit
2	Aidan O'Rourke	78.distribution of a controlled substance to minors
3		79.sexual assault of a minor
4		80.travel with the intent to engage in illicit sexual
5		contact;
6		81. Violation of Slavery pursuant to Thirteenth
7		Amendment
8		82.Hostile work environment
9		83.Aggravated Assault
10		84.Solicitation to commit murder
11		85.Violation of the Legal Immigration Family Equity
12		Act
13		86.Violation of the Hobbs Act
14		87.interstate mail and wire fraud
15		88.Intentional misrepresentation
16		89.Unjust enrichment
17		90.Violations of the travel act
18		91.ACTING IN BAD FAITH
19		92.Malicious Prosecution
20		93.Loss of Consortium
21		94.REVISION OF HISTORICAL FACTS FOR THE
22		PURPOSE OF FRAUD
23		95.Making false and fraudulent representations
24		96.conspiracy to violate RICO);
25		97. EX POST Facto reasoning for purposes of
26		defrauding the court and the world
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1	Apple Music	) 79.sexual assault of a minor
		)
2	Washington Post	) 80.travel with the intent to engage in illicit sexual
		)
3	Jeff Bezos	) contact;
		)
4	Visa	) 81. Violation of Slavery pursuant to Thirteenth
		)
5	Master card	) Amendment
		)
6	American Express	) 82.Hostile work environment
		)
7	Duncan Burch	) 83.Aggravated Assault
		)
8	Burch Entertainment	84.Solicitation to commit murder
9	Penthouse	85.Violation of the Legal Immigration Family Equity
10	Penthouse Club	Act
11	Scores	86.Violation of the Hobbs Act
12	Cruise Ships	87.interstate mail and wire fraud
13	Fox Media	88.Intentional misrepresentation
14	Comcast	89.Unjust enrichment
15	Elon Musk	90.Violations of the travel act
16	Microsoft	91.ACTING IN BAD FAITH
17	Oracle	92.Malicious Prosecution
18	At&T	93.Loss of Consortium
19	S&P Global Market	94.REVISION OF HISTORICAL FACTS FOR THE
20	Nasdaq	PURPOSE OF FRAUD
21	Bill Gates	95.Making false and fraudulent representations
22	The NFL	96.conspiracy to violate RICO);
23	The NBA	97. EX POST Facto reasoning for purposes of
24	Rappers	defrauding the court and the world
25	Rock stars	98.Uttering Threats
26	Hearst Communications	99. Tortious Interference
27	New York Times Company	100.Attorney Interference
28	BMW	101.Intentional infection with STDS

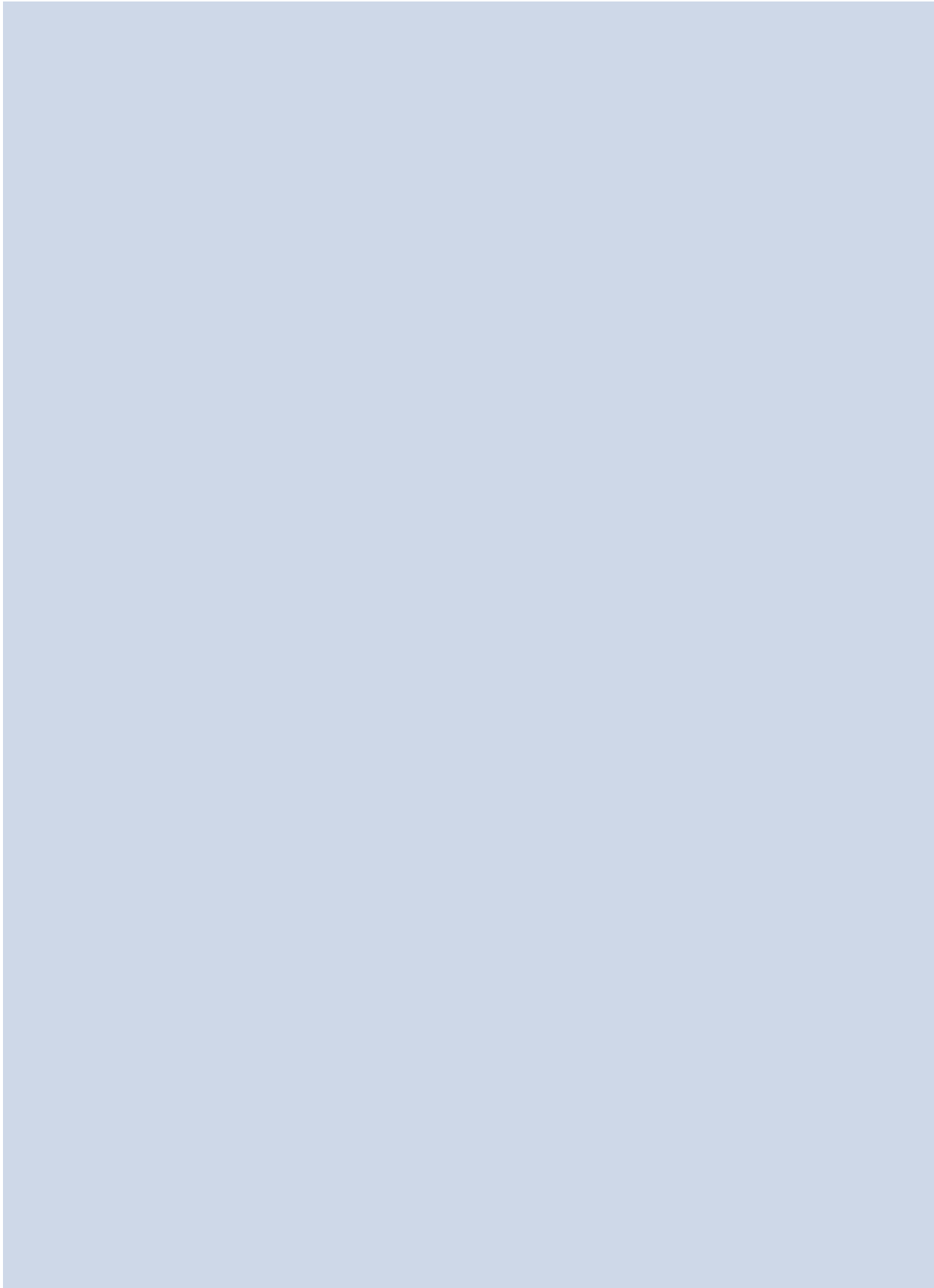
FORD MERCEDES

102. Contribution

Sony

103. Intentionally causing homelessness

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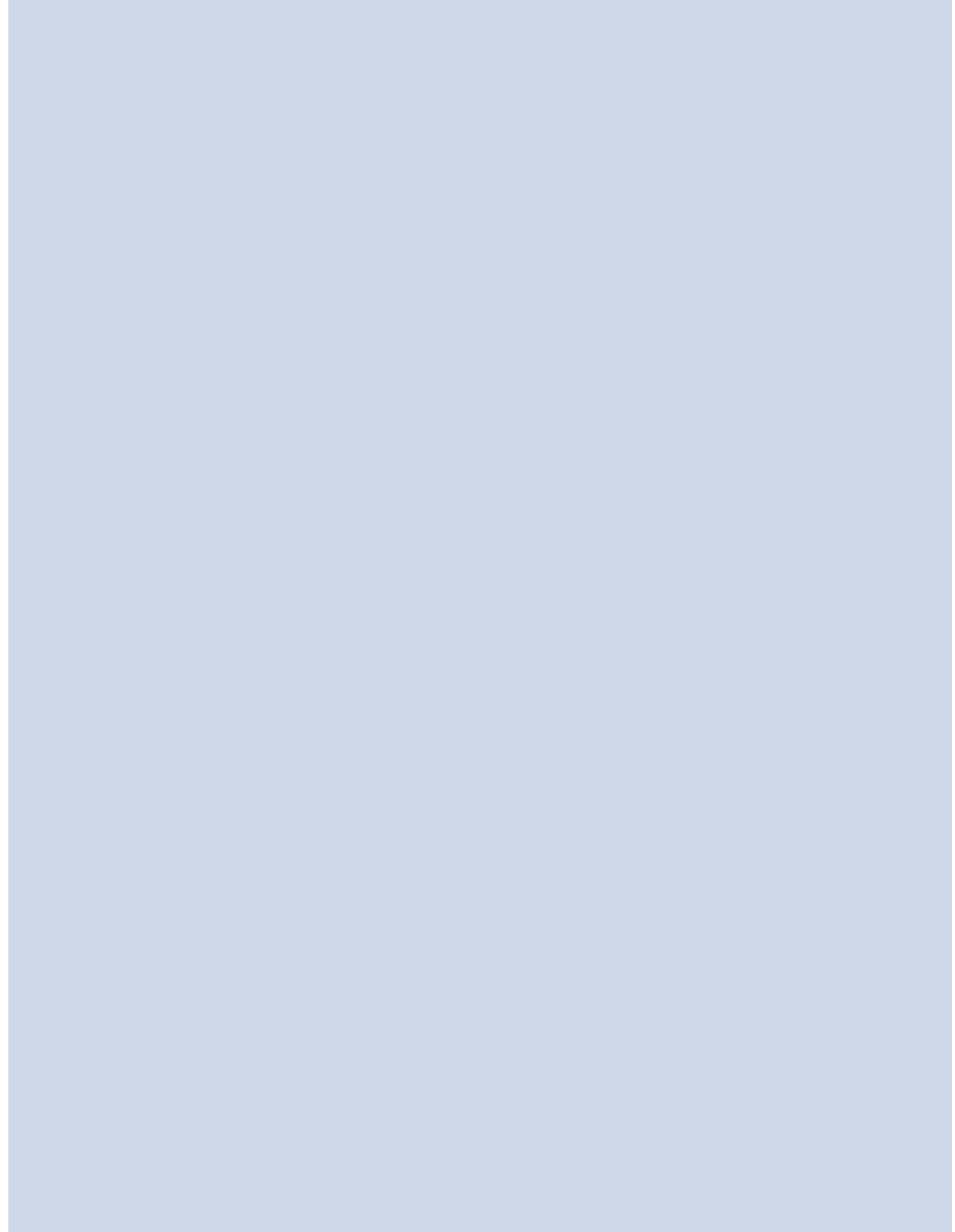


1	Daimler AG	) 123.INTERFERENCE
2	Peter M. Weil Lawyer	) 104.INTENTIONAL INTERFERENCE WITH
3	Cannon	) ECONOMIC RELATIONS
4	Samsung	) 105.Indemnity
5	Kodak	) 106.INTERFERENCE WITH STATE AND
6	Electric Motors	) FEDERAL JUDGES
7	Boeing	) 107.Manufacturing of weapons of mass destruction
8	Buick	) 108.Evasion of the Sex offenders list
9	Cadillac	109.Conspiracy to commit Tax evasion
10	Chevrolet	110.money laundering
11	GMC	111.California Code, Civil Code - CIV § 1708.85
12	Chrysler	112.47 U.S. Code § 230 - Protection for private
13	Dodge	blocking and screening of offensive material
14	Jeep	113. Violation of Legal Immigration Family Equity
15	Ram	Act
16	Ford	114. Breach of implied warranties and warranties
17	Lincoln	of fitness;
18	Tesla	115.Abuse of the discovery process
19	Petroleum companies	116 .Over whelming the plaintiff and the court with
20	BP oil	frivolous motions/pleadings/ papering
21	Chevron	117.22 YEARS OF MICHAEL GOGUEN
22	Stellantis	TRAFFICKING RAPE DISEASE EMOTIONAL
23	Ford Motor Company	ABUSE FRAUD DISTRESS SEXUAL ABUSE
24	Nissan	118.CHILD EXPLOITATION
25	Rivian Automotive	119.INVASION OF PRIVACY PUBLIC
26	VIA Motors	DISCLOSURE OF PRIVATE FACTS
27	Fiat	120.INVASION OF PRIVACY FALSE LIGHT
28	Toyota Motor Company	121. Invasion of Ambers mind
	Honda Motor Company	122. Invasion of Ambers body
	Nissan Motor Corporation	

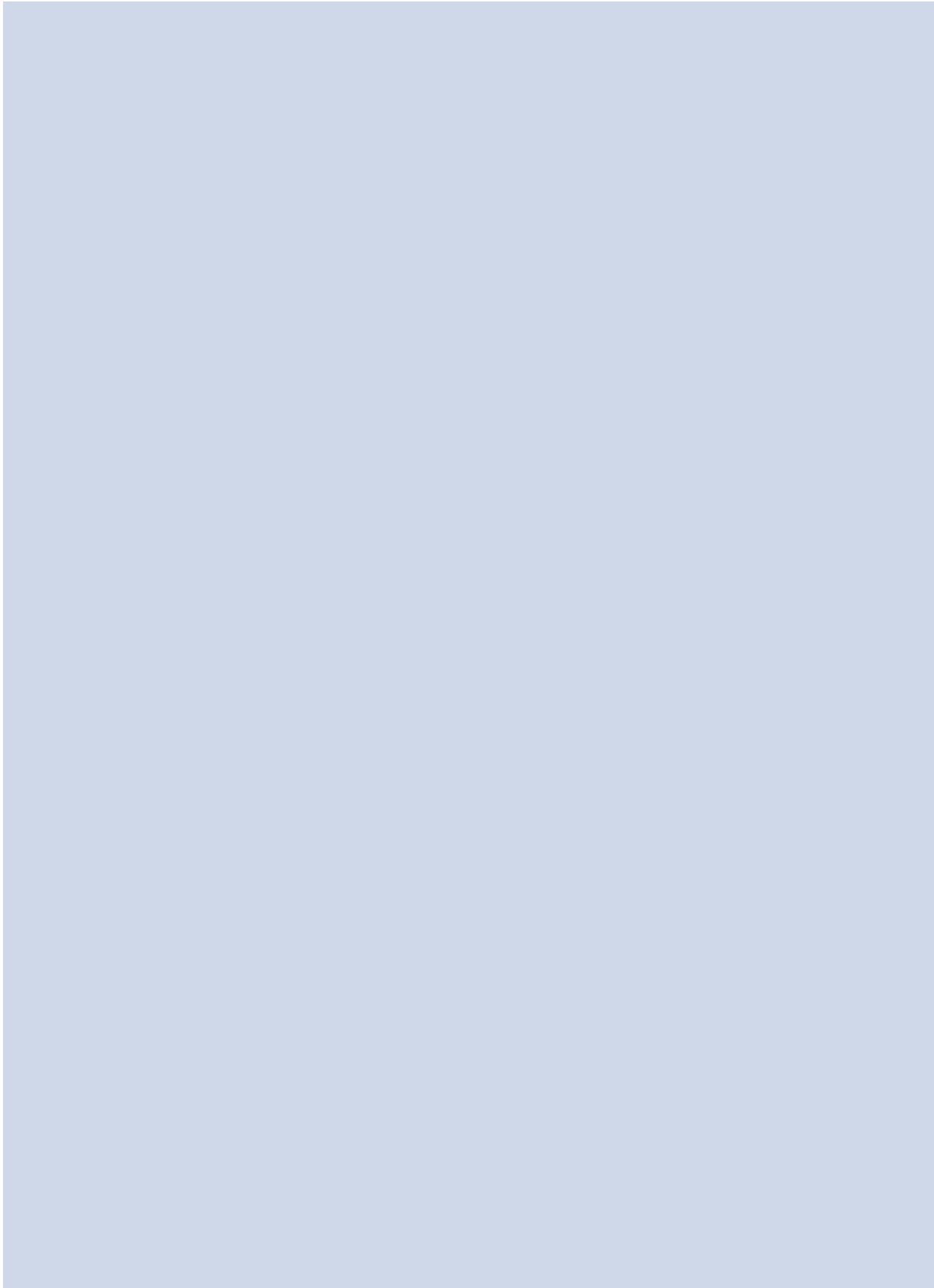
1	Universal Music Group	) 143.Violation Of §2G2.1 - SEXUALLY
		)
2	Anheuser-Busch InBev NV	) EXPLOITING A MINOR BY PRODUCTION OF
		)
3	Molson Coors Beverage Company	) SEXUALLY EXPLICIT VISUAL OR PRINTED
		)
4	Heineken Holding N.V.	) MATERIAL
		)
5	Diageo PLC	) 144.Violation of 18 U.S.C. § 2241(a) or (b)
		)
6	United Health Group	) Aggravated sexual abuse Annoying or molesting a
		)
7	Carlsberg Breweries	) child under 18 is covered under California Penal
		)
8	Molson Coors Beverage Company	Code Section 647.6.
9	The US mint	145.Violation of 18 U.S.C. § 2241(a) or (b)
10	Saudi Arabian oil company Aramco	Aggravated sexual abuse
11	Wal-mart	146.Violation of Victims of Crime Act
12	Proctor and Gamble	147.Violation of Violation of Marcys law
13	State Grid Cooperation	148.Violation of Violation of Ambers Law
14	Sinopec Group	149.Violation of 47 U.S. Code § 230 - Protection
15	Petro China	for private blocking and screening of offensive
16	CNPC	material
17	Apple	150.Violation of 18 of the U.S. Code, Section 798
18	Berkshire Hathaway	151. Violation of California Penal Code Section
19	CVS	538d PC
20	Fortune 500	152.Violation of 18 U.S. Code § 716 - Public
21	Interscope Records	employee insignia and uniform
22	Warner Records Republic Records	153.Violation of 18 U.S.C. 1513 - Retaliating
23	Columbia Label Group	against a witness, victim, or an informant
24	EMI	154.Violation of Section 1512 of Title 18
25	Sony Music	156.Violation of Penal Code Section 68 Bribery
26	MTV	157.Violation of Civil Code not Serving pleadings
27	Universal Music Group	158.Violation of 18 U.S. Code § 201 - Bribery of
28	Anheuser-Busch InBev NV	public officials and witnesses

1 Molson Coors Beverage Company

2 Heineken Holding N.V



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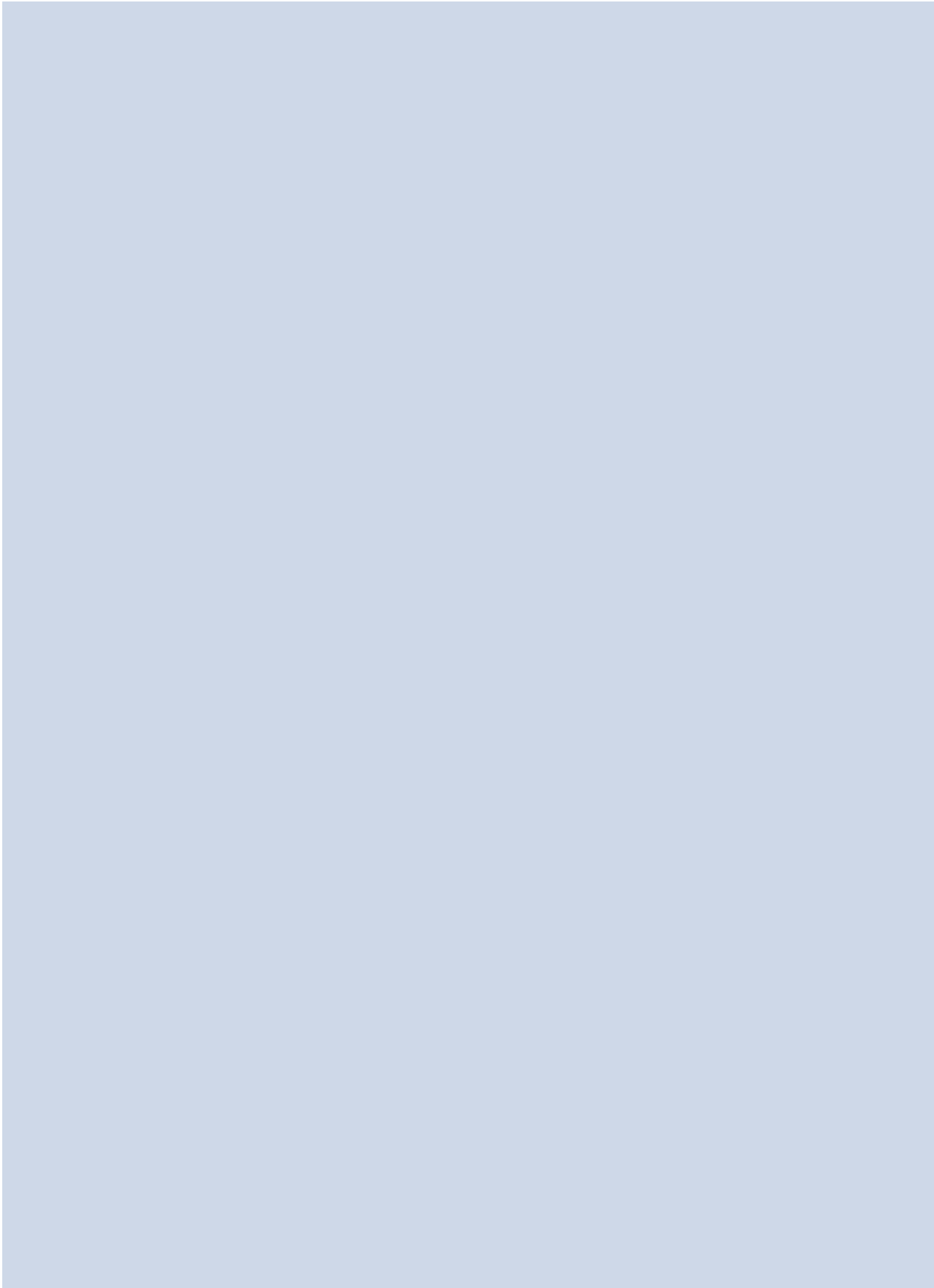
1	Diageo PLC	es159.Violation of PC 647(I) & PC 647(J)
2	United Health Group	CALIFORNIA'S PEEPING TOM LAWS
3	Carlsberg Breweries	160.Violation of US PENAL CODE 647(I) PC
4	Molson Coors Beverage Company	PEEKING WHILE LOITERING LAW
5	The US mint	161.Violation of(Penal Code 647(a) PC)LEWD
6	Saudi Arabian oil company Aramco	CONDUCT
7	Wal-mart	162.Violation of Trespassing (Penal Code 602 PC
8	Proctor and Gamble	163.Violation Of PENAL CODE 286 PC FORCED
9	State Grid Cooperation	SODOMY
10	Sinopec Group	164.Violation of California Penal Code 206:
11	Petro China	Torture,
12	CNPC	165.Violation of the federal civil rights act
13	Apple	166.Violation Of The US CONSTITUTION
14	Berkshire Hathaway	167.Violation Of THE CALIFORNIA
15	CVS	CONSTITUTION
16	Fortune 500	168.Violation Of Violation Of Universal Declaration
17	Amazon	of Human Rights - the United Nations
18	Alphabet	169.Vicarious liability; respondeat
19	Johnson&Johnson	superior170.Bribery of Reporters to print fake news
20	Tencent Holdings	171.Interference with medical treatment
21	Meta Platforms	172. EX POST Facto reasoning for purposes of
22	Nvidia	defrauding the court and the world
23	LVMH	174. Violation of Cal. Health & Safety Code §§
24	The US Mint	120130, 120290, 120500, 120600;
25	The World Bank	Transmission of STDS
26	All other Defendants to be added later	175. Transmission of STDS Cal. Penal Code §
27	Does 1 through 10,000,000	12022.85 (2022
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I am not Suing Judge Wayne she is a very Kind  
Lady , Alan Brown He is not evil . He must to take  
care of his Daughter Or Abhay Kholsa He is Kind

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1	I am not Suing Judge Wayne she is a very Kind	)	176.Violation Of the US Constitution and
2	Lady ,	)	amendments
3	I am Not suing Alan Brown He is not evil . He must	)	177. 178.Violation ofU.S.C., Section 1343 Wire
4	to take care of his Daughter	)	Fraud
5	I am not suing Abhay Kholsa He is Kind	)	179Violation of Tax evasion under 26 U.S.C. 7201
6	Everyone else is a defendant.	)	180.Violation of 26 U.S.C. 7206 Tax fraud
7		)	181.Violation of18 U.S.C. § 2251A - SELLING OR
8			BUYING OF CHILDREN
9	Does 1 through 10,000,000.00		182.Violation of 18 U.S. Code § 1030. hacking
10	Every single person business and agency who		183.Violation of 18 U.S.C. § 372 – Conspiracy
11	participated in Ambers trafficking, child Pornography		184 Violation of 18 U.S.C. § 2252.Child
12	and exploitation is a defendant.		Pornography
13			185 Violation of 18 U.S.C. § 873 Extortion
14			187 • 18 U.S.C. § 1460 - Possession
15			with intent to sell obscene matter on Federal
16			property
17			188 • 18 U.S.C. § 1460 - Possession
18			with intent to sell obscene matter on Federal
19			property
20			189 • 18 U.S.C. § 1460 - Possession
21			with intent to sell obscene matter on Federal
22			property
23			190 • 18 U.S.C. § 1461 - Mailing
24			obscene or crime inciting matter
25			191 • 18 U.S.C. § 1462 - Importation or
26			transportation of obscene matters
27			192 • 18 U.S.C. § 1463 - Mailing
28			indecent matter on wrappers or envelopes

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- ) 93 Violation Of 18 U.S.C. § 1465 - Transportation
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- ) of obscene matters for sale
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- ) 194 • 18 U.S.C. § 1466 - Engaging in
- )
- ) the business of selling or transferring obscene
- )
- ) matter
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- ) 195 • 18 U.S.C. § 1466A - Obscene
- )
- ) visual representations of the sexual abuse of
- )
- ) children
- 196. 18 U.S.C. § 1467- Criminal forfeiture
- 197. 18 U.S.C. § 1470 - Transfer of obscene
- material to minors
- 198. 18 U.S.C. § 2241 - Aggravated sexual abuse
- 199. 18 U.S.C. § 2242 - Sexual abuse
- 200. 18 U.S.C. § 2244 - Abusive sexual contact
- 201. 18 U.S.C. § 2251 - Sexual exploitation of
- children
- 202. 202. 18 U.S.C. § 2251A - Selling and buying
- of children
- 203. Bribery Of Reporters To print Fake news
- 204. Defamation
- 205 Violation of 18 U.S.C. § 1460 - Possession
- with intent to sell obscene matter on Federal
- property
- 206. Violation of 18 U.S.C. § 2252 - Certain
- activities involving sexual exploitation of minors •

207. Violation of 18 U.S.C. § 2252A - Certain  
activities relating to material containing child  
pornography•

208. Violation of 18 U.S.C. § 2252C - Misleading  
words or digital images on the Internet



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1 ) 209 •Violation of 18 U.S.C. § 2260 - Production of  
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3 ) sexually explicit depictions of a minor to Import into  
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5 ) United States•  
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7 ) 210. Violation of 18 U.S.C. § 2260A - Penalties for  
8 )  
9 ) registered sex offenders  
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11 ) 211. Violation of 18 U.S.C. § 2251A - Selling and  
12 )  
13 ) buying of children  
14 )  
15 ) 212. Violation of Racketeering 18 U.S.C. §  
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17 ) Violation of 1961 Computer hacking under 18  
18 )  
19 ) U.S.C. § 1030  
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21 ) 213. Violation of 18 U.S.C. § 1030 with the intent to  
22 )  
23 ) cause harm  
24 )  
25 ) 214. Violation of Computer Fraud and Abuse Act  
26 )  
27 ) 215. Violation of 18 U.S.C. § 1343 – wire fraud  
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216. Violation of 18 U.S.C. § 372 – conspiracy  
217. Violation of 18 U.S.C. § 373 – SOLICITATION  
TO COMMIT A CRIME OF VIOLENCE  
218. Violation of 18 U.S.C. § 2422 –  
SOLICITATION OF A MINOR  
219. Violation of FAILURE TO REGISTER AS A  
SEX OFFENDER - CALIFORNIA PENAL CODE  
290(B)  
220. Violation of California Penal Code 236.1:  
Human Trafficking  
212. Violation of California Penal Code 261: Rape  
213. Violation of • California Penal  
Code 266h: Pimping

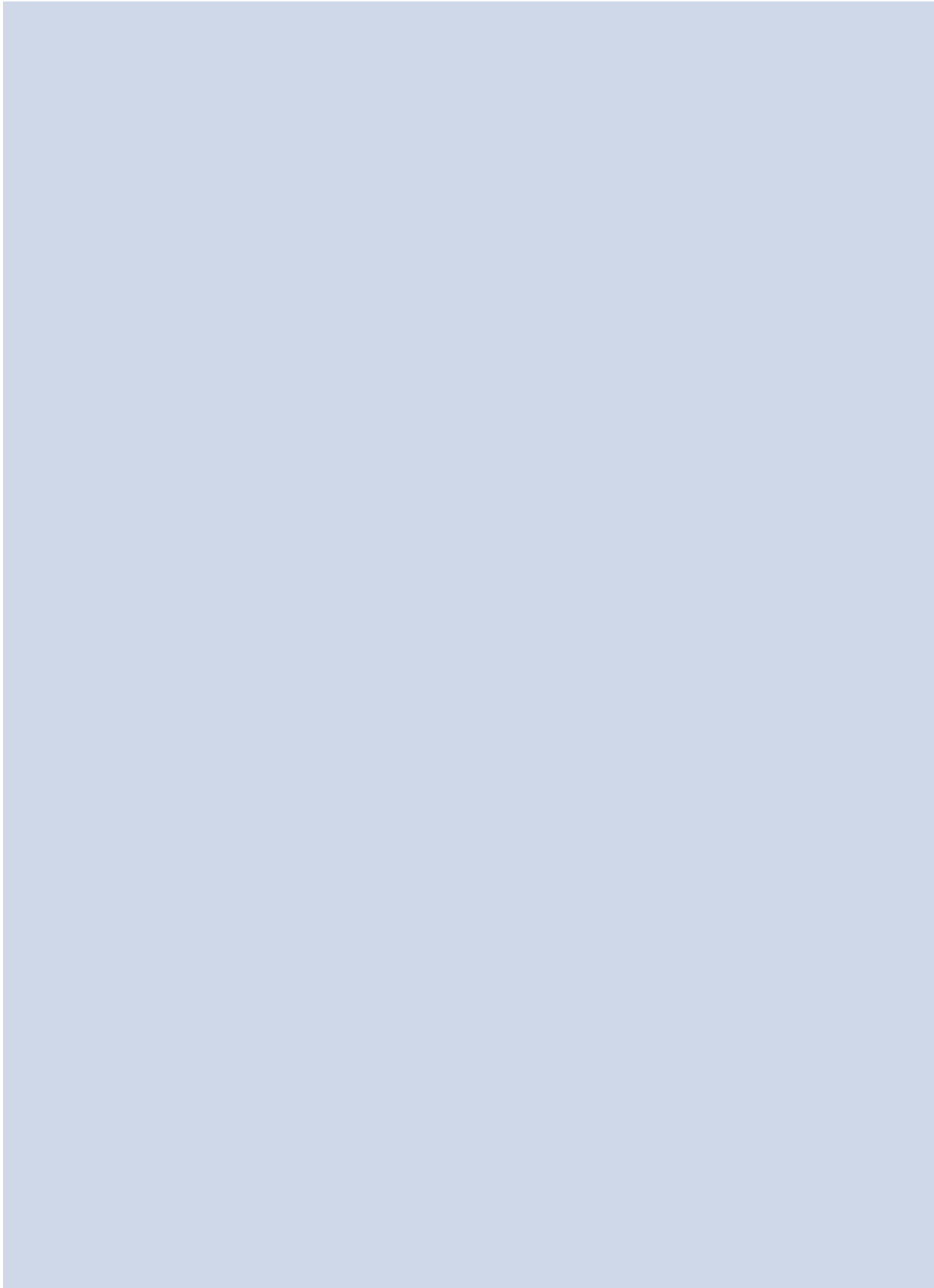
214. Violation of California Penal Code 266i:

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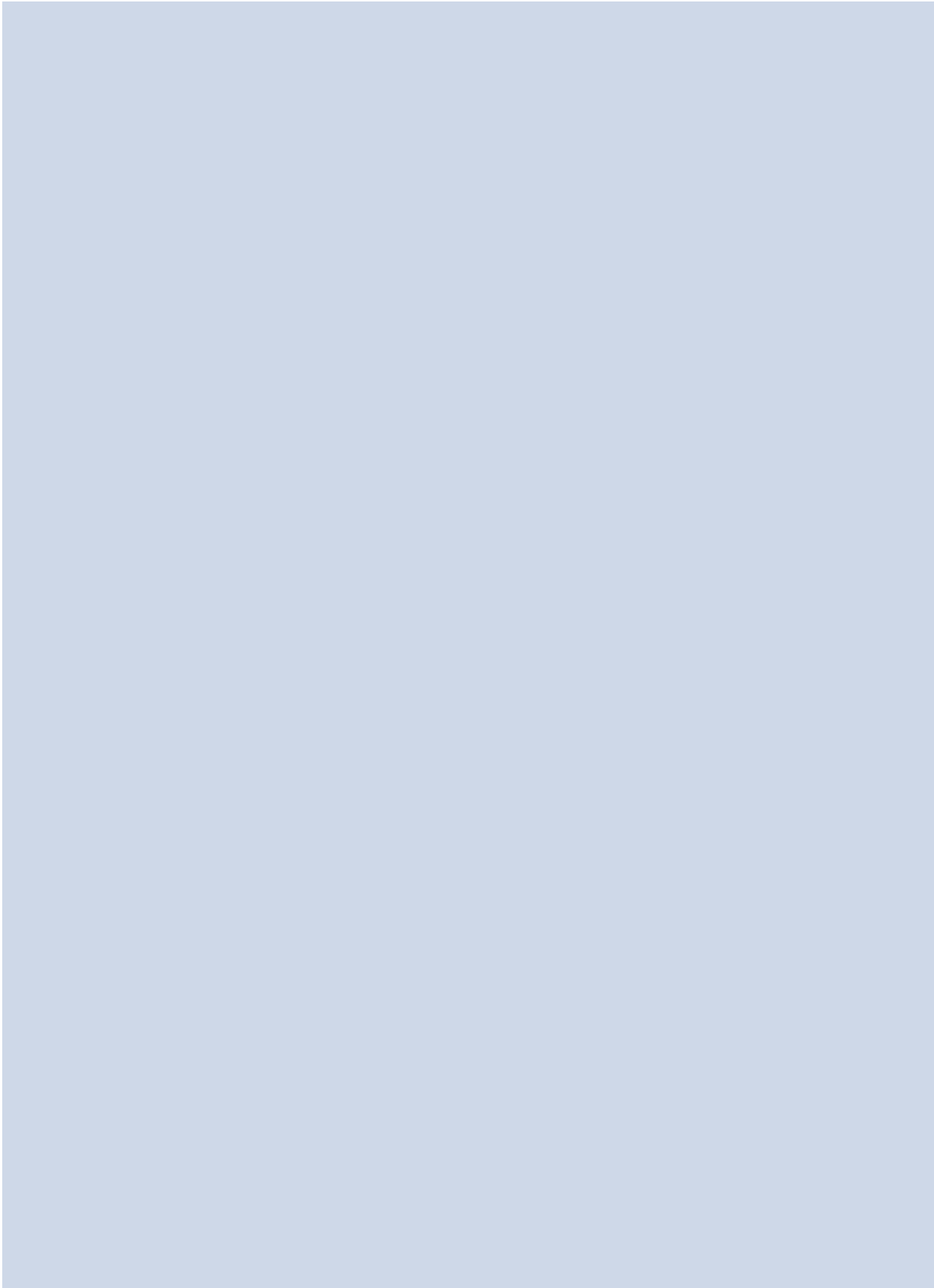
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1 ) b215. Violation of California Penal Code 286:  
2 ) Sodomy  
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4 ) 216. Violation of California Penal Code 667.71:  
5 ) Habitual Sex Offender  
6 )  
7 ) 217. Violation of Megans Law  
8 )  
9 ) 218.Violation of Jessies law  
10 )  
11 ) 219. Violation of Penal Code 286(c)(2)(A) for acts  
12 ) of sodomy when it's done against the victim's will  
13 )  
14 ) 220.using force, violence, duress, menace, or fear;  
15 )  
16 ) 221.Violation of Penal Code 286(c)(3) for acts of  
17 ) sodomy where it's done by threatening to retaliate  
18 ) in the future against the victim or other person;  
19 )  
20 ) 222. Violation of • Penal Code  
21 ) 286(d)(1) if you acted in concert with another  
22 ) person to commit acts of sodomy against the  
23 ) victim's will using force or fear;  
24 )  
25 ) 223. Violation of Penal Code 286(f) when the act is  
26 ) performed on a person unable to give consent,  
27 )  
28 ) 224. Violation of Jessicas Law  
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32 ) 226. Violation of Davids Law  
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34 ) 227.Violation of The Wetterling Act  
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36 ) 228.Violation of The Brady Handgun Violence  
37 ) Prevention Act  
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39 ) 229. Violation of The Human Trafficking Victims  
40 ) Protection Act  
41 )  
42 ) 230. Terrorism.  
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44 ) 231. Unlawful Endangerment

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9 ) using force, violence, duress, menace, or fear;  
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11 ) 235.Violation of • Penal Code 286(c)(3) for  
12 )  
13 ) acts of sodomy where it's done by threatening to  
14 )  
15 ) retaliate in the future against the victim or other  
16 )  
17 ) person;  
18 )  
19 ) 236.Violation of • Penal Code 286(d)(1) if  
20 )  
21 ) you acted in concert with another person to commit  
22 )  
23 ) acts of sodomy against the victim's will using force  
24 )  
25 ) or fear;  
26 )  
27 ) 237.Violation of Penal Code 286(f) when the act is  
28 )  
29 ) performed on a person unable to give consent,  
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31 ) 238. Violation of Jessicas Law  
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37 ) 241.Violation of The Wetterling Act  
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39 ) 242.Violation of The Brady Handgun Violence  
40 )  
41 ) Prevention Act  
42 )  
43 ) 242Violation of The Trafficking Victims Protection  
44 )  
45 ) Act  
46 )  
47 ) 244.Violation of . Acts under "color of any law"  
48 )  
49 ) include acts not only done by federal, state, or  
50 )  
51 ) local officials within the bounds or limits of their  
52 )  
53 ) lawful authority, but also acts done without and  
54 )  
55 ) beyond the bounds of their lawful authority;

provided that, in order for unlawful acts of any  
official to be done under "color of any law,"

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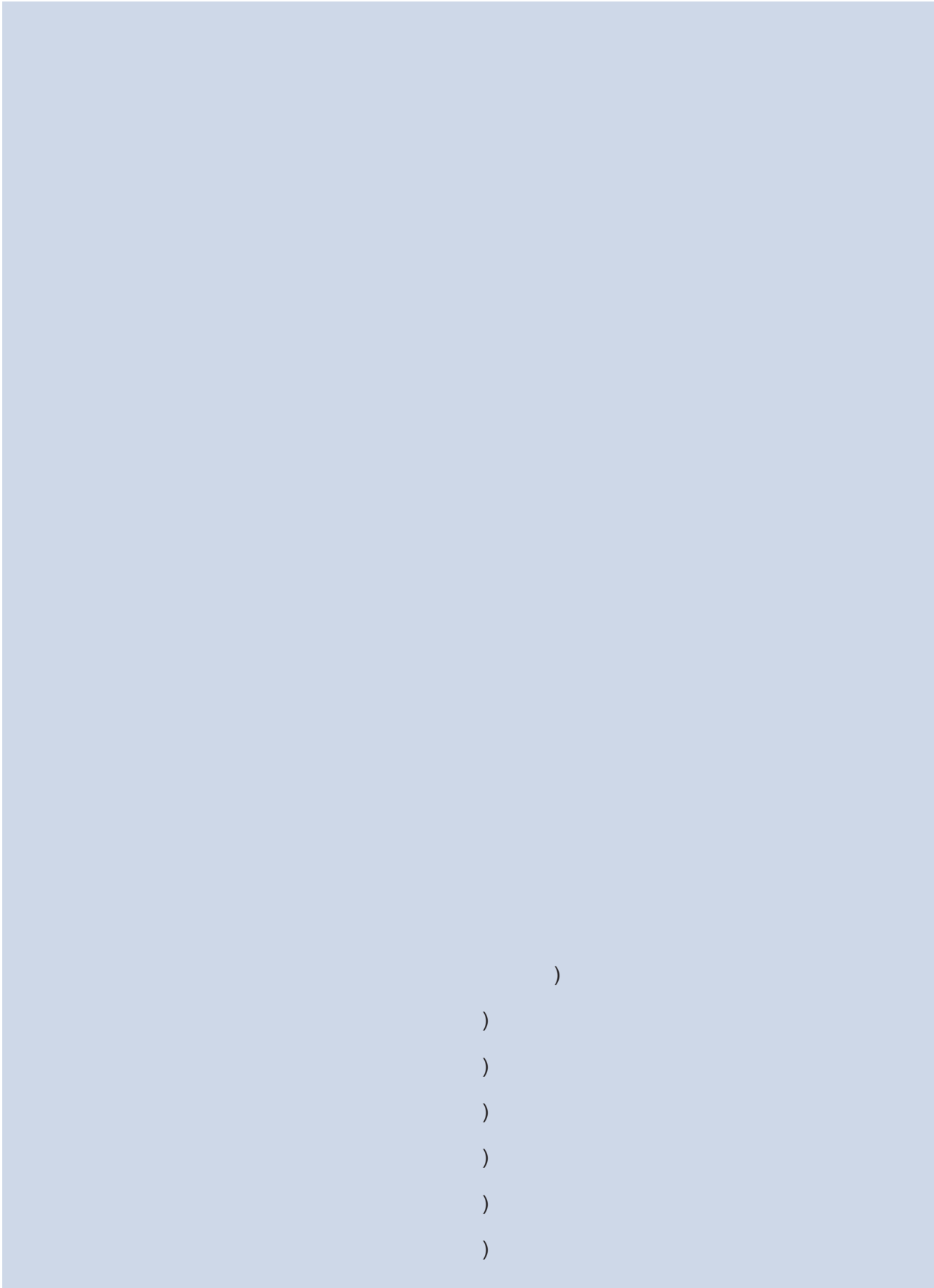
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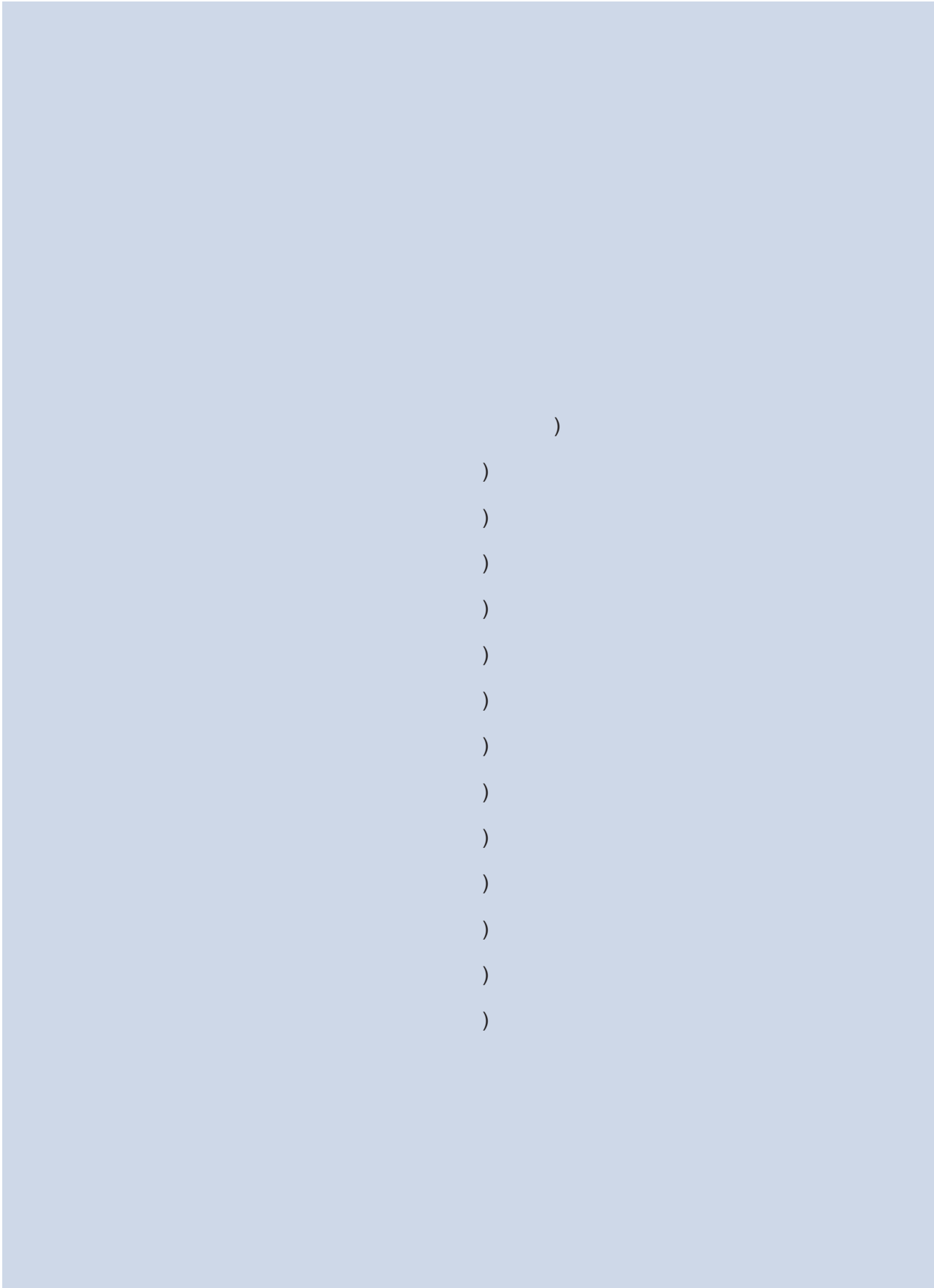
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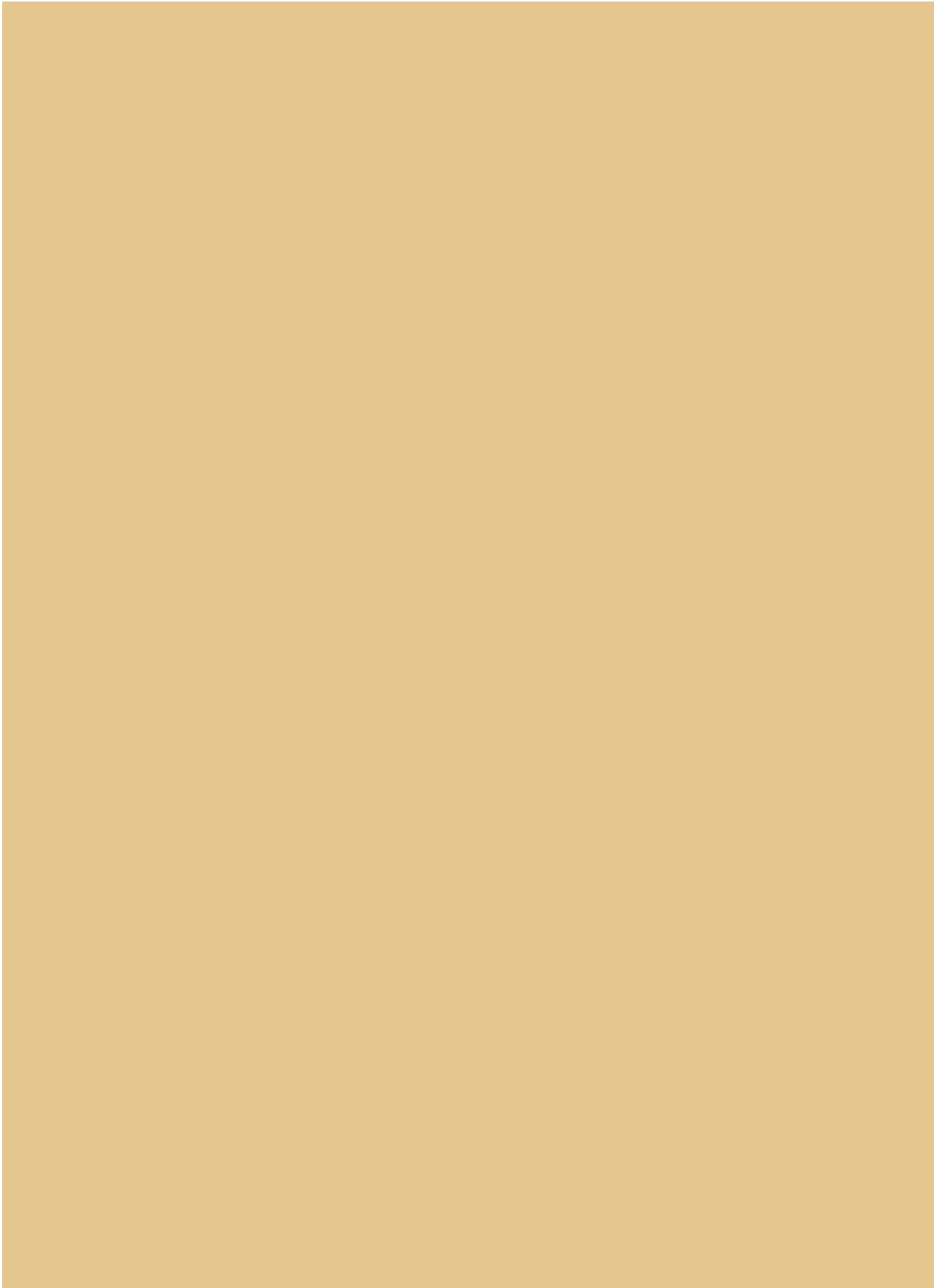
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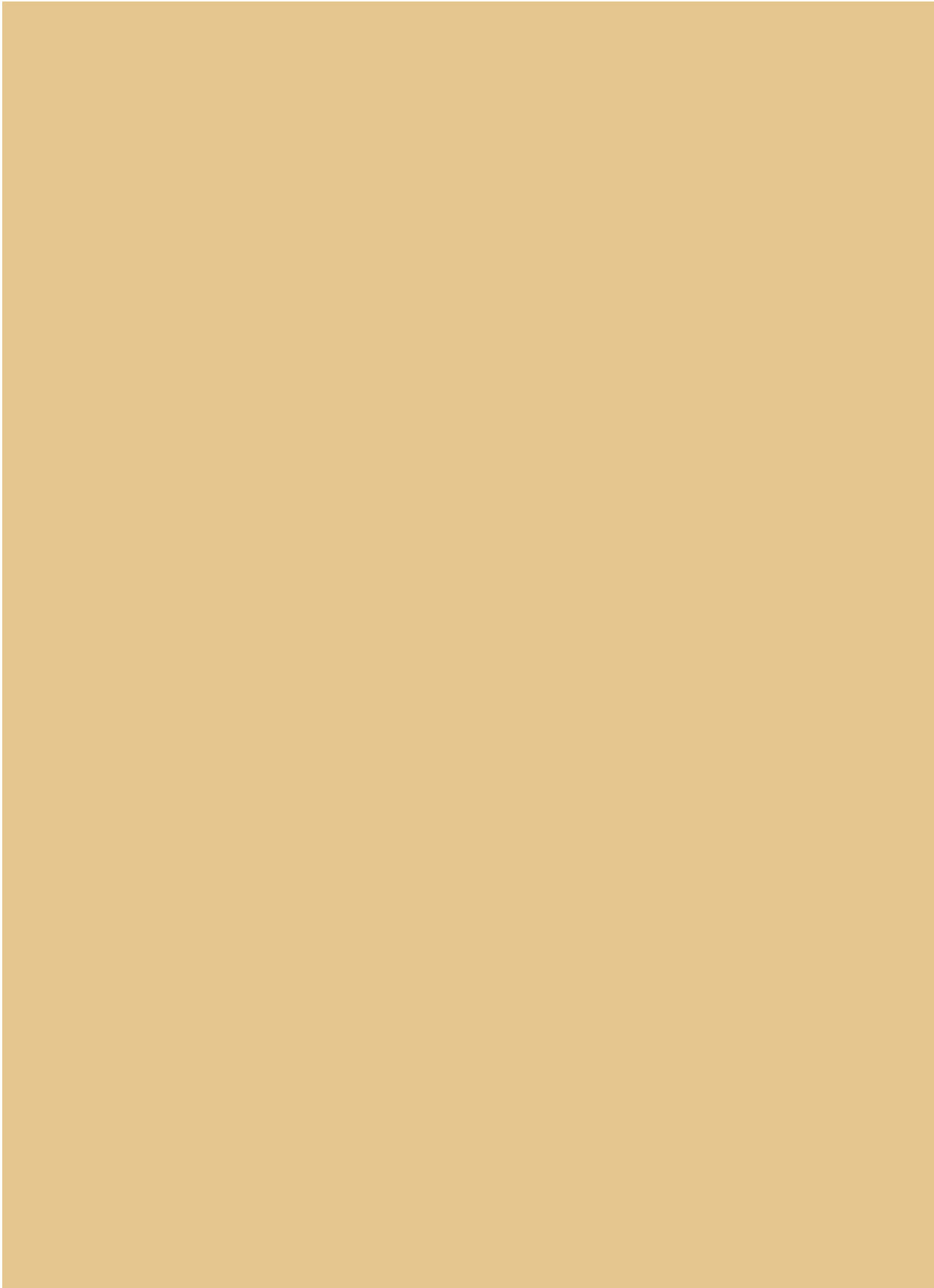
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2 All Additional Causes of Action will be added  
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4 upon discovery of what other crimes have been  
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6 perpetrated against Amber No photos of Child  
7  
8 Sex trafficking victims may be produced  
9  
10 during litigation No Names of any Human  
11  
12 Trafficker or Gang member may be announced  
13  
14 until I am Granted internationally protected  
15  
16 status to testify and a Female police guard  
17  
18 As Police rape Females while on duty and they  
19  
20 take bribes from Michael Goguen and The Gang  
21  
22 As it is common place for police to murder  
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24 innocent people in America No male police may  
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26 interact or interview Amber in Person.  
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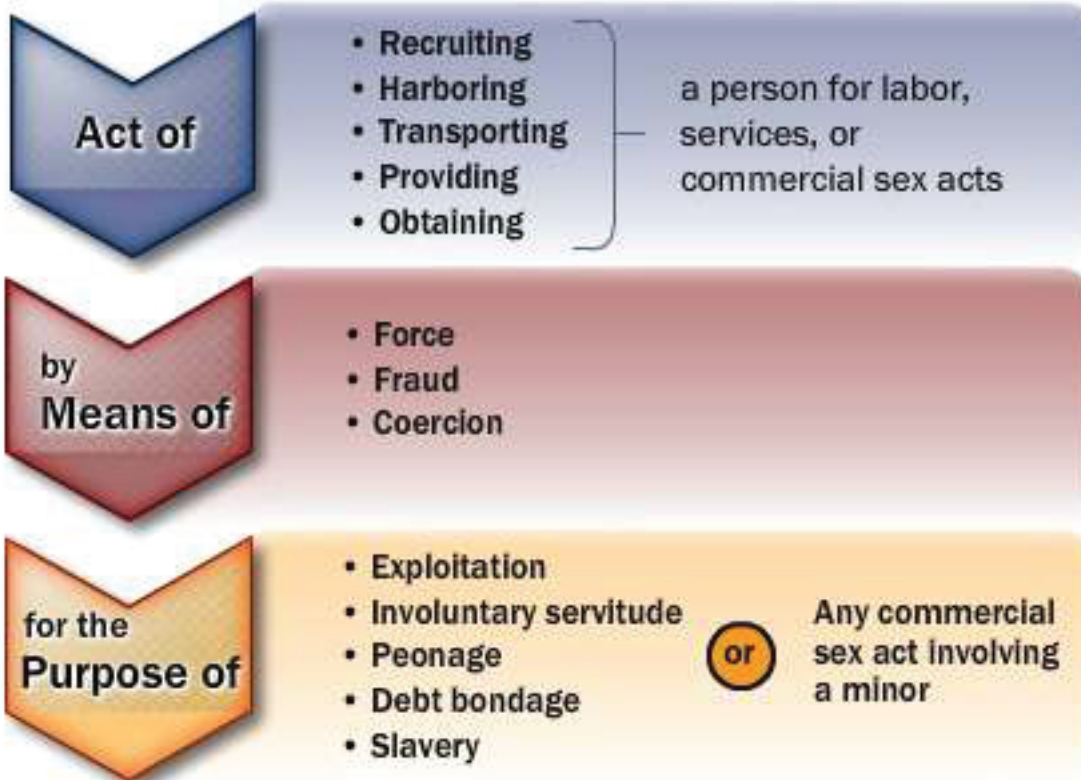


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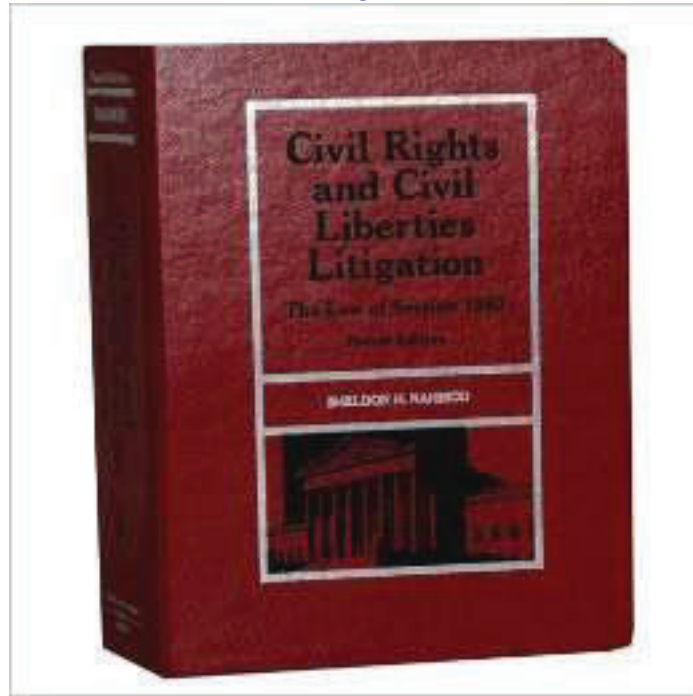


# Human Trafficking

is defined as the...



[www.dhs.gov/xlibrary/training/dhs\\_awareness\\_training\\_ty12/hta01/module.htm](http://www.dhs.gov/xlibrary/training/dhs_awareness_training_ty12/hta01/module.htm)



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THE WHITE HOUSE OFFICE

REFERRAL

To: The Secretary of Labor

Date: October 24, 1967

GENERAL  
HUS  
PR14/ST32  
HUS-1

ACTION REQUESTED

☐ Draft reply for:  
☐ President's signature.  
☐ Undersigned's signature.

☐ Memorandum for use as enclosure to reply.

☐ Direct reply.  
☐ Furnish information copy.

☒ Suitable acknowledgment or other appropriate handling.

☐ Furnish copy of reply, if any.

☐ For your information.

☐ For comment.

NOTE

Prompt action is essential.

If more than 48 hours' delay is encountered, please telephone the undersigned immediately, Code 1450.

Basic correspondence should be returned when draft reply, memorandum, or comment is requested.

REMARKS:

Description:

☒ Letter: ☐ Telegram: ☐ Other:

To: The President

From: Rhea Callaway, Natl Pres, Natl Assn of Media Women, Inc., 10 West 135th St.

Date: (recd 10/18/67) Suite 5 D, NYC 10037

Subject: Resolution of organization commending President's Executive order to protect women in US fm bias in area of Fed employment and asking extension of order to embrace all areas of employment to include mass communication, etc.

By direction of the President:

RECEIVED  
OCT 25 1967



H. J. Res. 1.

Sixty-sixth Congress of the United States of America;

At the First Session,

Begun and held at the City of Washington on Monday, the nineteenth day of May,  
one thousand nine hundred and nineteen.

JOINT RESOLUTION

Proposing an amendment to the Constitution extending the right of suffrage  
to women.

*Resolved by the Senate and House of Representatives of the United States  
of America in Congress assembled (two-thirds of each House concurring therein),  
That the following article is proposed as an amendment to the Constitution,  
which shall be valid to all intents and purposes as part of the Constitution when  
ratified by the legislatures of three-fourths of the several States.*

"ARTICLE ————.

"The right of citizens of the United States to vote shall not be denied or  
abridged by the United States or by any State on account of sex.

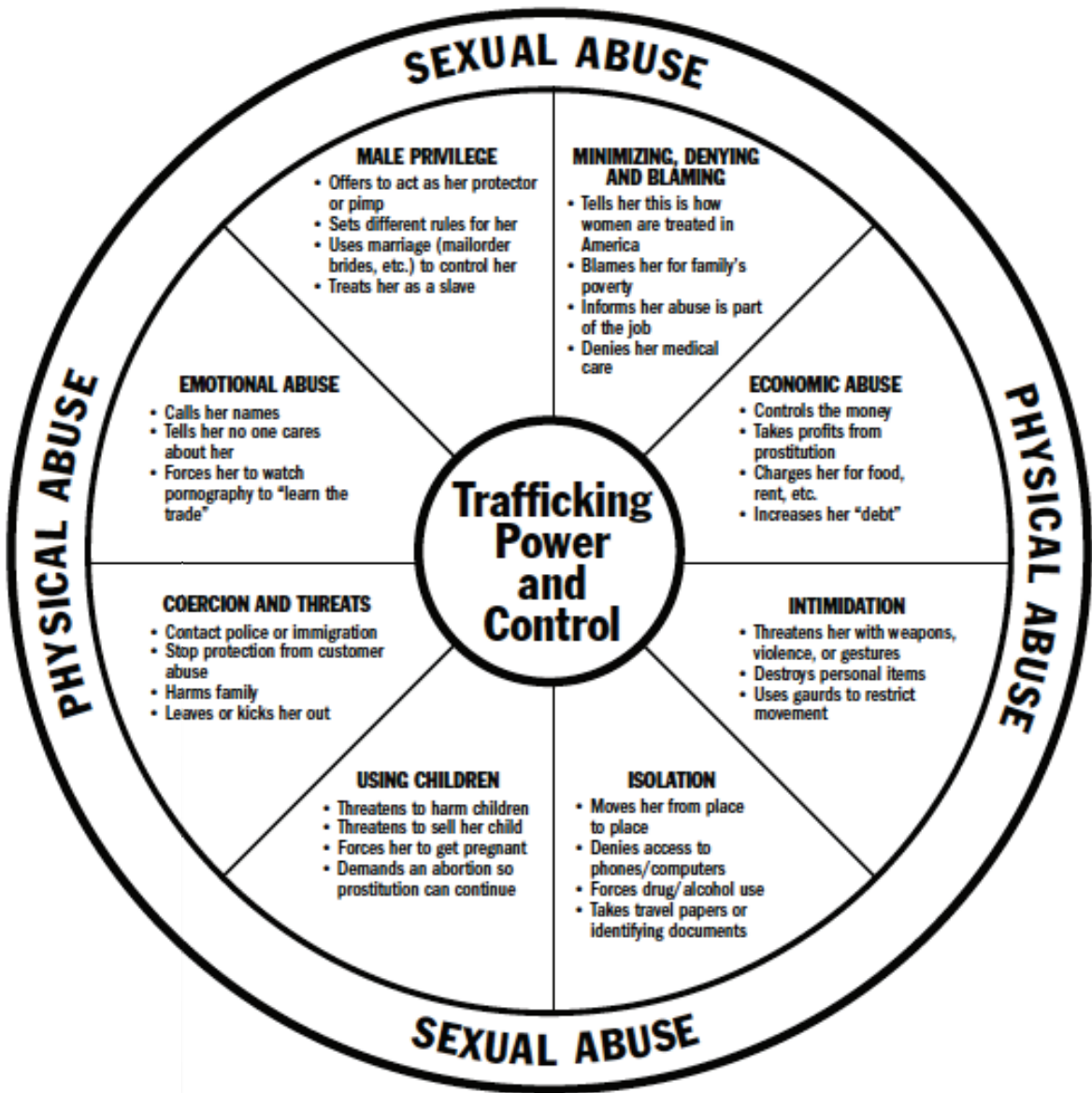
"Congress shall have power to enforce this article by appropriate  
legislation."

*J. H. Cullen*  
Speaker of the House of Representatives.

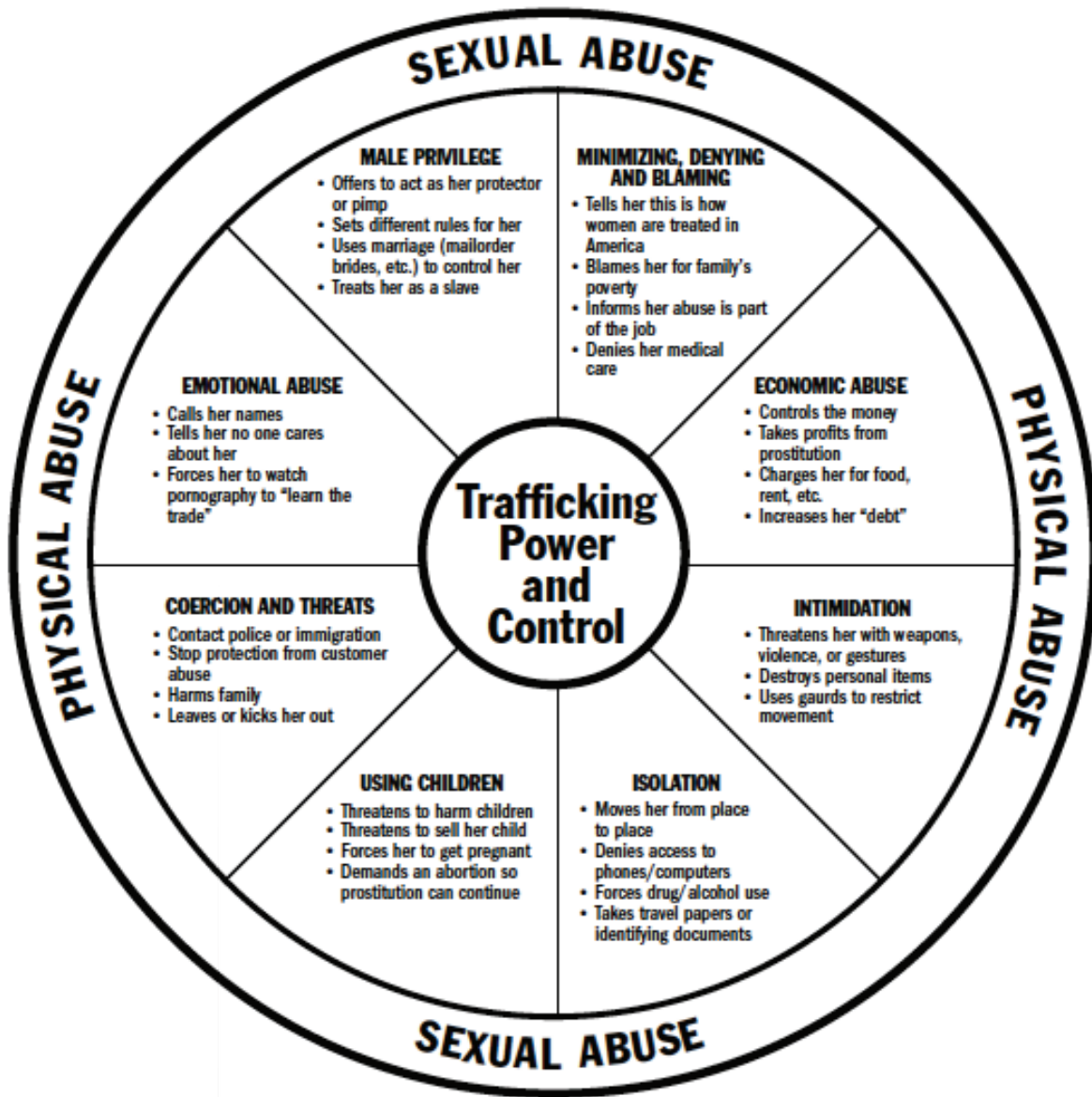
*Thos. R. Marshall*  
Vice President of the United States and  
President of the Senate.

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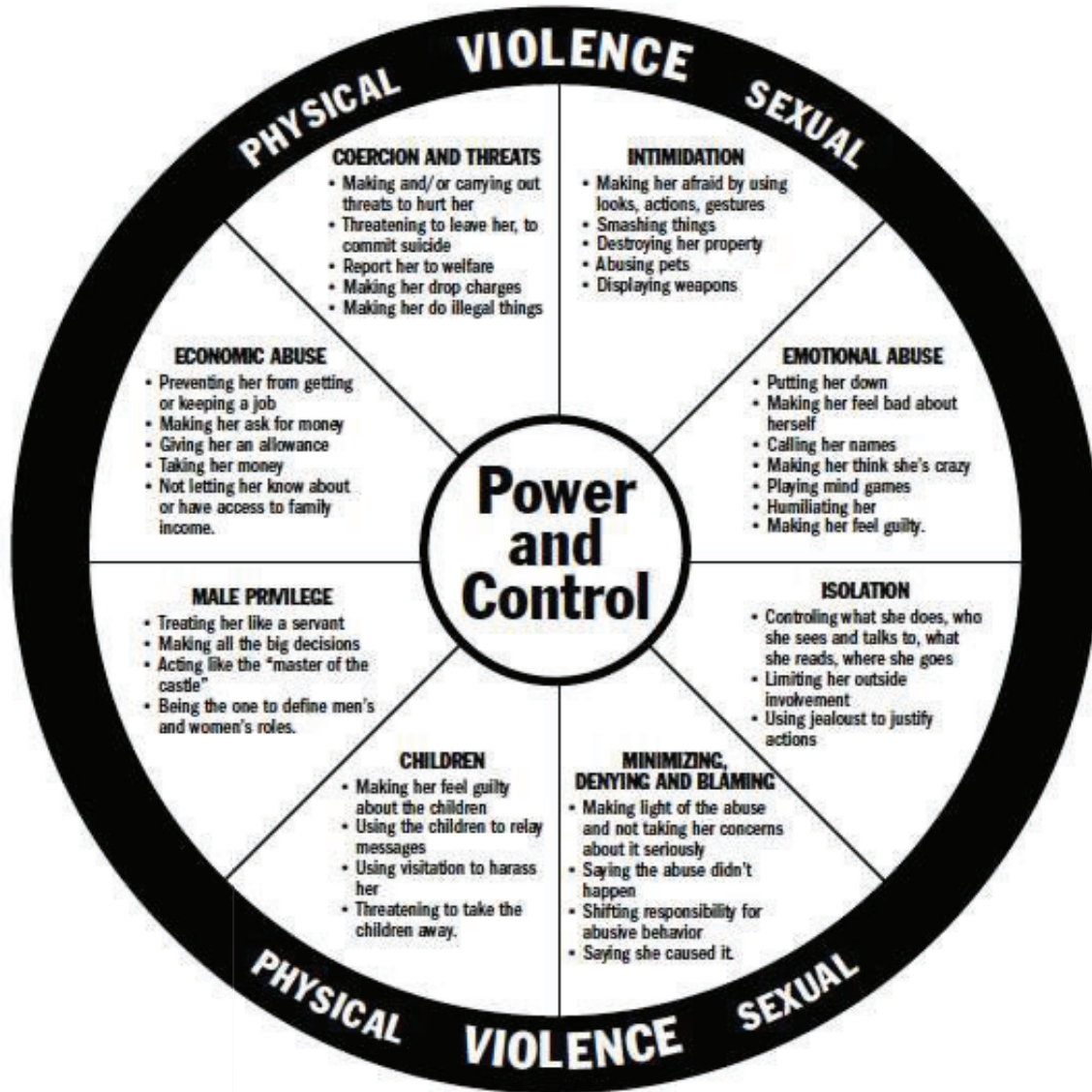








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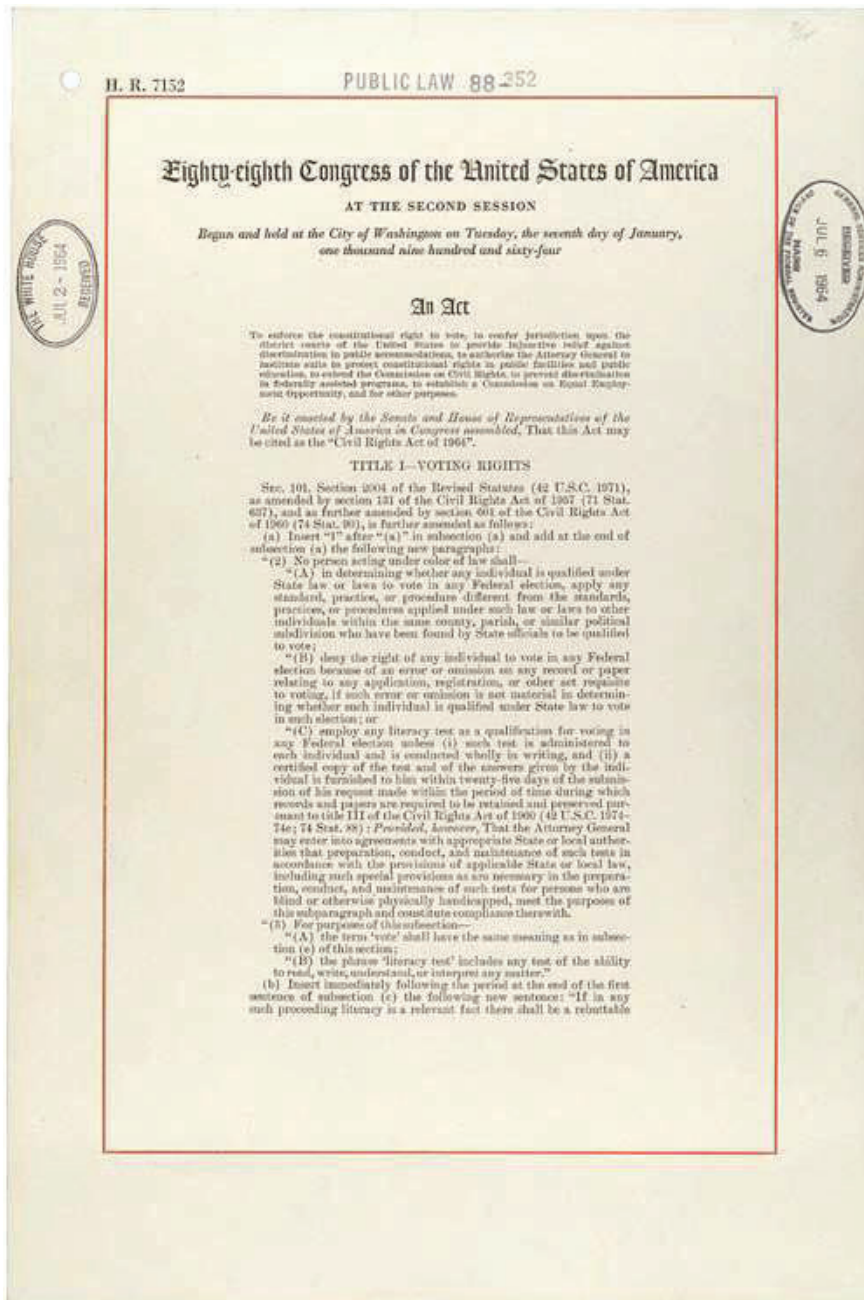
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Nature of the case

Human Trafficking by The Gang to be referred to in all filings until there is a internationally protected person order in place and police guards so that I may testify If the lawyers or Goguen reveal the name of the gang no person in my life is safe and I doubt any of them are either.

If they kill Goguen for poking around and sending people to their doors that is not anyones fault but his own and the lawyers and investigators who did it. I did not go tress-passing around on their door steps I was never planning to speak a word as long as I lived about the Gang. Every document with their names must be redacted until an order is signed for my protection.

The Gang and Michael L Goguen, Michael L Goguen Trust, A Numbered account at Bank of America, Two Bear Ranch, Valley Oaks LLC, Sequoia capital, Two Bear Capital were the original traffickers The Hotels, buildings, bars, means of transportation, media outlets and currently all of the lawyers, Judges and everyone illegally Living off of the avails of Ambers Human trafficking in a inhumane, malicious, exploitive, hellacious and criminal scheme where they have conspired together and are profiting from Ambers situation of slavery and have become her new and current

1 traffickers who are unlawfully endangering Ambers life with the  
2 stalking, hacking, solicitation of murder and involving the Gang in  
3 this legal case which was for breach of contract for the  
4 Trafficking, rape, abuse, exploitation suffered at the hands of  
5 Michael L Goguen.  
6

7  
8 The Judiciary the FBI the CIA the State Bar the Judicial Council  
9 And The US Government do not work for Michael Lewis Goguen, Sequoia  
10 Capital Or Quinn Emanuel LLP This is Corruption and a violation of  
11 all citizens right to safety and Knowledge of the corruption and  
12 the Sex offender.  
13

14  
15 18 U.S.C. § 1591 – Sex Trafficking of Children or by Force,  
16 Fraud, or Coercion  
17 (a) Whoever knowingly –  
18 (1) in or affecting interstate or foreign commerce, or within the  
19 special  
20 maritime and territorial jurisdiction of the United States,  
21 recruits,  
22 entices, harbors, transports, provides, obtains, or maintains by  
23 any  
24 means a person; or  
25 (2) benefits, financially or by receiving anything of value, from  
26 participation  
27 in a venture which has engaged in an act described in violation of  
28 paragraph (1), knowing, or in reckless disregard of the fact, that  
means  
of force, threats of force, fraud, coercion described in subsection  
(e) (2),  
or any combination of such means will be used to cause the person  
to  
engage in a commercial sex act, or that the person has not attained the  
age of eighteen years and will be caused to engage in a commercial  
sex

act, shall be punished as provided in subsection (b).

(b) The punishment for an offense under subsection (a) is -

(1) if the offense was effected by means of force, threats of force, fraud,

or coercion described in subsection (e) (2), or by any combination of

such means, or if the person recruited, enticed, harbored, transported,

provided, or obtained had not attained the age of fourteen years at the

time of such offense, by a fine under this title and imprisonment for

any term of years not less than fifteen or for life; or

(2) if the offense was not so effected, and the person recruited, enticed,

harbored, transported, provided, or obtained had attained the age of

fourteen years but had not attained the age of eighteen years at the

time of such offense, by a fine under this title and imprisonment for

not less than ten years or for life.

(c) In a prosecution under subsection (a) (1) in which the defendant had

a reasonable opportunity to observe the person so recruited, enticed,

harbored, transported, provided, obtained or maintained, the Government

need not prove that the defendant knew that the person had not attained

the age of eighteen years.

(d) Whoever obstructs, attempts to obstruct, or in any way interferes with or

prevents the enforcement of this section, shall be fined under this title,

imprisoned for a term not to exceed twenty years, or both.

Legal Definitions of Trafficking 309

(e) In this section:

(1) The term "abuse or threatened abuse of law or legal process" means

the use or threatened use of a law or legal process, whether administrative, civil, or criminal, in any manner or for any purpose

for which the law was not designed, in order to exert pressure on another person to cause that person to take some action or refrain from taking some action.

(2) The term "coercion" means -



1 (A) threats of serious harm to or physical restraint against any  
2 person;  
3 (B) any scheme, plan, or pattern intended to cause a person to  
4 believe  
5 that failure to perform an act would result in serious harm to or  
6 physical restraint against any person; or  
7 (C) the abuse or threatened abuse of law or the legal process.  
8 (3) The term "commercial sex act" means any sex act, on account of  
9 which anything of value is given to or received by any person.  
10 (4) The term "serious harm" means any harm, whether physical or  
11 nonphysical, including psychological, financial, or reputational  
12 harm,  
13 that is sufficiently serious, under all the surrounding  
14 circumstances, to  
15 compel a reasonable person of the same background and in the same  
16 circumstances to perform or to continue performing commercial  
17 sexual  
18 activity in order to avoid incurring that harm.  
19 (5) The term "venture" means any group of two or more individuals  
20 associated in fact, whether or not a legal entity.  
21 310 Appendix A  
22  
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Amber was trafficked by an organized crime syndicate that began  
trafficking her shortly before her 15th birthday.

A relative was involved in her trafficking she was then lost  
in a bet to an organized crime syndicate and held in debt bondage  
for several years being beaten, starved, tortured and made to work  
from 11 am to 4 am in clubs all over the world. Amber had no  
passport and no identification of her own the identification was  
created and  
held by the traffickers.

1 In or around 2001-2002

2

3 Upon arrival in Texas the first time. Michael L Goguen was  
4 introduced to her he had a preexisting relationship with the club  
5 and the traffickers. The club admits to having minors work in the  
6 club.  
7

8

9 This is illegal. Teenagers can not be Strippers nor can they  
10 work in brothels. Waitresses and patrons have to be 21 years old to  
11 be in bars. So how can 15 ,16 ,17 ,18 ,19 or 20 year old girls be  
12 topless or nude in bars and be served alcohol?  
13

14

15 Within 1 hour of Amber meeting Goguen a Sex trafficker by the  
16 very definition, Goguen has thousands of girls and women  
17 transported around the world for the purposes of rape, commercial  
18 sex acts, sexual abuse and intentionally infects his slaves with  
19 STDS. He has caused severe and irreparable injury to Ambers body  
20 on multiple occasions. In 2009 or 2010 Amber confronted Goguen about  
21 the HPV diagnosis she had recently received. There is no other  
22 means by which Amber could have contracted this disease other than  
23 Goguen he was having sex with hundreds of prostitutes without  
24 condoms at that time unbeknownst to amber he promised that he had  
25 never had any STDS in his life. He instructed her to set up two  
26 companies so he could pay for her medical care in conjunction with  
27  
28

1 the Disease. Such diseases leads to Cervical cancer, vaginal  
2 cancer, throat cancer in women. Goguen fully admits that he had  
3 this disease since he was in collage and that he has been  
4 undergoing treatment for the lesions on his penis including  
5 Cryosurgery and excision.  
6

7  
8 Michael Goguen is a SEX TRAFFICKER. He uses the Romeo pimp  
9 method to manipulate his victims He uses all of the same tactics  
10 and a Romeo pimp he just does not earn money off of the  
11 exploitation but he pays for his friends to violate his victims.  
12 This is the Lover Boy Method. Girls who are trafficked feel  
13 worthless. It's not easy to survive. So men convince them that they  
14 are the only ones that will ever love them and that the trafficking  
15 and abuse was all the victims fault.  
16

17 They use tactics like we will deport you if you ever say  
18 anything. They manipulate the victims families. Some victims of  
19 these pimps work normal jobs during the day and they pimp them out  
20 at any venue they can find at night. They typically impregnate  
21 their victims and use the children as tools to force the victim to  
22 remain complicit be threatening to hurt her children.  
23

24  
25 If Michael Goguen ever impregnated Amber and she could not obtain a  
26 safe abortion she would hide the child deep inside of a foreign  
27 country so Michael Goguen could not rape the child. He has forced  
28

1 many of his victims to abort pregnancies he caused. He also has  
2 dozens of children with victims of Michael Goguen Sex enterprise.  
3 Rape victims should never be forced to give birth to a child that  
4 is a product of a rape.

5  
6 Some women choose to bring a child who is conceived of rape  
7 into the world but how fair is it to the mother and the child. If  
8 the can make the best of a horrible situation that is the only  
9 saving grace.

10  
11 Tragically Amber fell victim to all four of the most prolific types  
12 of traffickers

13  
14 Romeo Pimp

15 The Romeo pimp manipulates victims into compliance by using  
16 affection, charm, and romantic affection (Winters et al., 2022). To  
17 entrap their victim, Romeo pimps rely heavily on emotional  
18 manipulation and future promises. (Duncan and DeHart, 2019). The  
19 key point is that the trafficker presents himself as a trustworthy  
20 individual to the victim. This is demonstrated by a 2010 study  
21 conducted in Chicago, which discovered that the vast majority of  
22 women described their trafficker as their boyfriend, with only a  
23 few describing them as other friends or relatives (Duncan and  
24 DeHart, 2019).

25  
26 The grooming time is used by Romeo pimps to isolate the victim and  
27 make them codependent, exposing the victim's vulnerabilities that  
28

1 can be used against them for control. The relationship typically  
2 takes a dark turn when the Romeo pimp asks the victim to dance in a  
3 strip club or engage in prostitution in order to make money to  
4 support their life together. At this point, the relationship  
5 includes extreme psychological manipulation as well as the  
6 possibility of physical violence, which is introduced to control  
7 the victim. This type of trafficking is especially coercive because  
8 the victim is trapped not only physically, but also emotionally.

#### 10 Gorilla Pimp

11 A Gorilla pimp is the opposite of a Romeo in that no staged love or  
12 affection is involved. Instead, women are recruited and trapped in  
13 sex trafficking through routine violence. It is made clear that a  
14 victim's job is to turn tricks on the street or dance in a club,  
15 and failure to do so will result in severe consequences, usually  
16 resulting in physical and sexual abuse (Kennedy et al., 2007). It  
17 is not uncommon for a trafficker to begin as a Romeo pimp before  
18 gradually shifting to gorilla tactics (Kennedy et al., 2007). There  
19 is ample evidence in the sex trafficking literature that Gorilla  
20 pimps are the most difficult to leave and provide the least agency  
21 to victims of sex trafficking (Marcus et al., 2014).

#### 24 CEO Pimp

25 On the other end of the spectrum, the CEO pimp promises victims  
26 lucrative careers and legitimate income (Winters et al., 2022). The  
27 CEO pimp runs things in an entrepreneurial manner, focusing on  
28

1 profit and good business management, just like a legitimate  
2 business. They see sexual exploitation as a business plan, with  
3 victims serving as their products. They typically recruit their  
4 victims by offering them a job, such as a modeling contract. This  
5 relationship, like the previous types of traffickers, then descends  
6 into sexual exploitation and abuse, even as the trafficker promotes  
7 it as a life of luxury. This is referred to as trauma bonding, a  
8 form of coercive control in which traffickers instill fear as well  
9 as gratitude for being allowed to live (Litam, 2017).

#### 11 Familial Trafficking

12 Many commercially exploited children in the United States have been  
13 sexually abused in the home (Shared Hope International, 2020).

14 Statistics show that 27 percent of sex trafficking cases reported  
15 to the United States' National Human Trafficking Hotline in 2018  
16 were cases of familial trafficking (Polaris, 2019). As with all sex  
17 trafficking cases, it is frequently misidentified as child abuse or  
18 rape. The scant research on familial trafficking suggests a wide  
19 prevalence range, ranging from 3% to 44% of child trafficking cases  
20 (Allert, 2022). Unlike previous types of traffickers, children  
21 exploited by family members may be abused at home but are still  
22 driven to buyer locations and taken to parties and venues where  
23 sexual abuse of children is a part of the experience (Allert,  
24 2022). Children have a reasonable expectation of care, protection,  
25 and security from their families, and a breach of these values can

1 have long-term consequences for mental health and future  
2 relationships. The reality is that familial human trafficking is  
3 all too common, and we must shatter the myth that relatives are  
4 never involved in child trafficking.

5  
6  
7  
8 After many many deleterious and malicious acts perpetrated against  
9 Amber Goguen violently raped her in a hotel in London, England In  
10 2012. He left the hotel and left her bleeding in the room alone  
11 with no help. She only learned he had left the hotel room when his  
12 driver asked the hotel staff to call the hotel room.

13  
14 Amber sought medical help the best way she could in a foreign  
15 country with no medical insurance and not knowing anybody other  
16 than for a couple of hours in passing.

17  
18 Amber had no idea the extent of the injury and went to several  
19 clinics she was scared that if she told the police she could be  
20 hurt or trafficked again. Amber went to see several gynecologists  
21 and proctologists once a scope was done she was informed surgery  
22 was necessary.

23  
24  
25 Amber told Goguen and his response was to send unsolicited money in  
26 the amount of \$100,000.00 for the surgery Goguen never called or  
27 asked if he could assist in any way. Because he is a rapist and a  
28

1 psycho path. As long as he can pay for the damage he believes his  
2 nefarious conduct is acceptable.

3 Goguen has forced many of his victims to abort pregnancies he has  
4 caused.

5  
6  
7 In 2014 when Amber could no longer endure the abuse that Goguen  
8 stated he would force her to endure as part of his harem for the  
9 remainder of her life. Amber hired Rivers Morell to help her obtain  
10 medical treatment and safety. Amber did not know lawyers she did  
11 not think very much about what their exact duties were. She found  
12 Rivers by looking for rape victims lawyers. Amber thought lawyers  
13 were governed by the law of the land.  
14

15  
16 Amber had confronted Goguen again about the stalking and messages  
17 received on her phone.

18  
19  
20 Goguen denied all of this because he is a psychopath.

21  
22 Rivers Morell Drafted a letter and a draft complaint after meeting  
23 Amber in a coffee shop for an hour. Amber did not know what the  
24 California legal process was she did not know what mediation or  
25 draft complaints or demand letters were. Rivers Morell Stated he  
26 was an expert in Rape cases and helped many women.  
27  
28



1 Plaintiffs Lawyers especially of victims a crime can not be  
2 manipulating and exploiting their clients.

3 I was told the lawyers are in control of me and the case. Later on  
4 I was told that the lawyers are working at my direction that is  
5 also improper trauma victims can not comprehend how to manage their  
6 hellacious lawyers.  
7

8  
9 The plaintiffs are not lawyers that are victims of crimes. Ambers  
10 case his is not a simple issue of slip and fall.

11 How is a rape victim with no legal experience supposed to be in  
12 charge of Patricia Glaser who has been a lawyer for 50 years and  
13 has an entire firm of lawyers and friends who are judges.  
14

15  
16 How is a victim of human trafficking supposed to know what  
17 Patricia Glaser or any other lawyer is supposed to be doing. When I  
18 went to a lawyer after Diane Doolittle did so many cruel inhuman  
19 and illegal things I was so terrified I would not show the Personal  
20 injury settlement agreement to the lawyers because I thought  
21 showing a lawyer would be a breach. Goguen told me he and his law  
22 firms we my lawyers.  
23

24 Why would any person be paying a lawyer if they are supposed to  
25 know everything the lawyer is supposed to be doing? This is more  
26 abuse of process.  
27  
28

1 Rivers Morell told Amber that it was California law that he must  
2 ask for mediation before filing a lawsuit. He never showed the  
3 demand letter to Amber after a lawsuit was filed in 2016 by  
4 Patricia Glaser Amber read the demand letter.  
5

6  
7 After Michael Goguen was served the letter Drafted by Rivers Morell  
8 that Amber never seen that has not extortionate demands in nature  
9 but merely a request for mediation nobody said they were calling  
10 the police nobody sis they were going to kill Goguen.

11 Amber did not want to endure a criminal lawsuit and lose any more  
12 years of peace and safety in her life.  
13

14  
15 Goguen contacted Amber calling up to 25 times per day asking her to  
16 speak to him directly.

17 Amber pleaded with him to get Diane Doolittle and to go to  
18 mediation. Goguen and his lawyers stated they could represent Amber  
19 rote a promissory not and stated that she had to fire Rivers Morell  
20 that he was a criminal that he was stalking her and that he would  
21 steal all of her money. Amber did not know lawyers Amber does not  
22 trust people.  
23

24 Goguen called multiple times a day threatening her to fire the  
25 lawyer or that she would receive zero medical treatment. Diane  
26 Doolittle stated she was going to trap Rivers Morell and that she  
27 would set him up to look like a criminal.  
28

1  
2 Michael Goguen said the agreement that they were writing was in  
3 Ambers best interest and that she would forever be free of all  
4 abuse and exploitation. Goguen said he wanted forgiveness for all  
5 the rape abuse and disease.

6  
7 Amber believes in forgiveness however this individual has a mental  
8 illness and he has zero remorse for what he does to his victims.

9 Michael Goguen said he was removing all of his lawyers sneaking  
10 legal wording from the Personal injury settlement agreement. Amber  
11 does not know what provisions exactly that he removed.  
12

13  
14 Michael Goguen believes he can just pay and make every crime co  
15 mmits be covered up by government authorities .  
16

17 Anthony McCusker of Goodwin Procter and Diane Doolittle of Quinn  
18 Emanuel and Wilson, Sonsini ,Goodrich and Rosati drafted letters  
19 and messages for Amber to send to fire Rivers Morell.  
20

21  
22 Goguen stated he could act as Amber's lawyer in her best  
23 interests because he was experienced educated and had teams of  
24 lawyers. Michael Goguen has no license to practice law so that was  
25 illegal amber found out later.  
26  
27  
28

1 All of February, March, April and 23 days of May 2014 Michael  
2 Goguen bullied threatened and manipulated Amber into signing the  
3 contract that he and his lawyers wrote she had no legal advice.  
4 Nine years after Amber was again promised her freedom from rape and  
5 trafficking by Goguen. Amber is currently being trafficked and  
6 stalked by all of Goguens lawyers agents and associates. This is  
7 Malicious. Amber never agreed that 58 or more lawyers could  
8 illegally profit of of Ambers rape, trafficking, homelessness for  
9 nine years and counting  
10  
11

12 This is my own personal holocaust this is worse than the  
13 transatlantic slave trade worse than Hitlers Nazi Germany, worse  
14 than North Korea, Worse than Putins Russia, Stalins Russia and  
15 Apartheid combined all wars combined. Girls and women are humans  
16 this Male Supremacy needs to end.  
17

18 I don't know of many women raping and trafficking children in most  
19 cases its because the women themselves were raped and trafficked so  
20 they did it to others.  
21

22 Women are not born to being rapists, pedophiles and traffickers.  
23 The only thing Amber asked was that Michael Goguen sign a pledge  
24 that he would not harm any more girls and women sexually or  
25 otherwise.  
26  
27  
28

1 Men under no circumstances should be gynecologists there are  
2 hundreds of sub specialties they do not need to be examining  
3 women's vaginas all day everyday that is perverse. So many  
4 gynecologists violate their patients. Even if they are not rapists  
5 It is still strange men are not women I don't know why they are  
6 pretending to know what happens in a woman's body. They don't, they  
7 are merely guessing.  
8

9  
10 He insisted that Amber abandon her modest apartment her only home  
11 upon the signing his personal injury settlement agreement because  
12 he was erecting naked princess panty parlor in Los Angeles within  
13 walking distance of Ambers apartment.  
14

15 The store Which he named after Amber he has been referring to Amber  
16 as naked princess for 22 years.  
17

18 Amber complied with Michael Goguens demand and abandoned her home  
19 and her life.  
20

21 The agreement was signed at the Rosewood Sand Hill hotel a  
22 destination of human trafficking.

23 There was a prostitution ring being run out of the jewelry store  
24 in the lobby of the hotel.  
25

26 Michael Goguen housed many of his sex slaves at the Rosewood Sand  
27 Hill.  
28

1 Goguen would come and go in full combat clothing and in between  
2 meeting from his office at Sequoia Capital which paid for hotels  
3 Food and transportation of Amber starting in 2002.  
4

5  
6 On May 14,2023 Sequoias notary came to the Rosewood Sand Hill and  
7 notarized the Personal injury settlement agreement created by  
8 Michael Goguen.

9 Quinn Emanuel LLP, Goodwin Procter LLP and Wilson Sonsini Goodrich  
10 and Rosati LLP.

11 Amber was crying in the common area of the hotel while Goguen  
12 groped her while waiting for Sequoias notary.  
13

14  
15 The Personal injury agreement was notarized in the Business center  
16 of the hotel after the agreement was signed Michael Goguen went to  
17 the room to rape Amber one last time to seal the deal and make sure  
18 that she would comply and never speak of the abuse.  
19

20  
21 Amber did not understand that the agreement was a contract as she  
22 is not a lawyer she is not a juris Doctor.  
23

24 Amber is a victim of child sex trafficking she was forced to  
25 dance in strip clubs and have photos taken as a minor in states of  
26 undress. She has no legal education. The agreement is titled  
27 personal injury settlement agreement not contract.  
28

1  
2 Amber asked Michael Goguen to start going to therapy to stop  
3 abusing girls and women he promised to begin after the agreement  
4 was signed. He set up weekly phone calls to speak with A even  
5 though his agreement at Ambers request states no further contact as  
6 she was very scared he would continue to stalk her or kill her.  
7  
8 Amber feels a very heavy burden that if she had told the police  
9 sooner Michael Goguen would not have been able to rape all of these  
10 girls and women and destroy so many human lives.

11  
12  
13 After Goguen raped Amber the last time on May 23, 2014 he continued  
14 to call her and request more debasing sodomy which she sated could  
15 never happen again do to the severe damage he caused in 2012.

16 Months passed by and Goguen was still call amber talking about sex  
17 sodomy all of his marital problems with his concubine his daughters  
18 drug addiction his other daughter issues and his sons  
19 hospitalization for strep throat asking Amber to pray for them. She  
20 has never met any of his children with multiple prostitutes all  
21 over the country. the only wife who was Not a prostitute was Lynne  
22 Isbicki  
23

24  
25 In December of 2014 Diane Doolittle sent Amber a message to Ambers  
26 phone stating the agreement that they wrote was null and void as  
27 procured by extortion. There was no extortion they are the ones who  
28

1 wrote the agreement and forced Amber to fire her only lawyer a solo  
2 practitioner.

3  
4 Diane Doolittle said Amber could not Call Rivers Morell and tell  
5 him what happened or he would sue her.  
6

7  
8 DIANE DOOLITTLE DID ALL OF THIS AFTER WAITING FOR THE CLOCK TO RUN  
9 OUT ON AMBERS STATUTE OF LIMITATIONS TO BRING A CASE FOR BEING  
10 RAPED. Diane Doolittle did not inform Amber of her statute of  
11 limitations nor Did Michael Goguen.

12 Michael Goguen and Diane Doolittle did not inform Amber that if  
13 GOGUEN breached the contract that they created Amber would lose her  
14 right as a victim of sex crimes to file her case as Jane Doe to  
15 protect her from further harm.  
16

17  
18 Patricia Glaser informed Amber that a breach of contract had to  
19 be filed with a name AND NOT A PSEUDONYM.  
20

21 Goguen Put in writing that the legally binding agreement would be  
22 enforced in every court of law.  
23

24 Michael Goguen never mentioned the word extortion nor did he  
25 mention the word defamation nor did his lawyers. Goguen said the  
26 agreement was so Amber could have safety, peace, happiness, medical  
27 treatment, freedom from rape, stalking slavery and so that she  
28



1 could go forth and help the child victims in foster care still  
2 trafficked or in orphanages. Prior to sex trafficking Amber was a  
3 volunteer even as a small child. during sex trafficking Amber  
4 participated in the food and toy drive every year. She would ask  
5 all of her customers to come that weekend and bring toys and she  
6 was allowed to charge any amount for the dances and sell items like  
7 panties for any amount and all of the money was given to children  
8 charities. Many girls hated it. Amber did not mind she was happy  
9 about the money not going to the traffickers. The liquor sales  
10 those days also went to children charities. Amber has no knowledge  
11 of why the clubs do this. Likely a cover for the trafficking and  
12 money laundering. After paying off her debt bondage  
13  
14 Amber still did not have the freedom to do anything she wanted in  
15 her life. She began to ask women to allow her to come to classes  
16 and various events. She donated her time to as many projects as  
17 possible while studying. All the while still enduring Goguens  
18 abuse. the abuse was now limited to only Goguen.  
19  
20

21  
22 Rather than tell Amber to find secure and preserve evidence Diane  
23 Doolittle instructed Amber in writing to destroy evidence. Diane  
24 Doolittle stated Amber was a prostitute and that she should not  
25 have money because Doolittle is ivy league educated and a former  
26 prosecutor and she does not earn the amount of the settlement  
27 agreement for her work. She stated that She knows Amber is not a  
28

1 victim because she was a prosecutor. Amber was not a prostitute.  
2 She was trafficked as a teenager to strip clubs by an organized  
3 crime syndicate.  
4 Goguen turned her into his personal prostitute in the harem after  
5 she told him from day one that she was a virgin he would go to her  
6 small apartment where she had an air mattress on the floor and  
7 would Master-bate on her face after telling her she was not good  
8 enough to be seen in public with.  
9

10 He told her to refer to him as a king and an emperor and that he  
11 would help her escape the traffickers and ho to medical school. He  
12 then began just leaving any amount of money behind after  
13 violating her. He never helped her escape from traffickers  
14

15  
16 Amber paid the debt after several years and never looked back none  
17 of the traffickers had anyway of finding her or hurting her again.  
18

19  
20 After months of Diane Doolittle's terrorism and Goguens  
21 manipulation and abuse Amber Hired Patricia Glaser. She trusted  
22 Patricia Glaser implicitly. Amber is very upset and disappointed  
23 that Patrica Glaser abandoned her case.

24 Amber never trusted any of the lawyers after she was put in a  
25 position where she had to call hundreds of male lawyers and talk  
26 about the facts and nature of the case every time damaging Ambers  
27  
28

1 mind more and more. Amber never wanted any of the lawyers she hired  
2 after Patrica Glaser.

3 There was only one male lawyer Amber wanted to hire and He does  
4 not want to deal with Diane Doolittle ever because she is a nasty  
5 horrible unethical piece of work. She is a sorry excuse for a  
6 women. Diane Doolittle has victimized many other rape victims not  
7 just Amber.  
8

9 I refuse to take Diane Doolittle's deposition I am finding a  
10 volunteer lawyer to do it. She is never allowed to speak to me in  
11 court or touch my dog who she made fun of and touched without  
12 permission. Because she is an awful human being. Excuse me but what  
13 did my dog do to Diane Doolittle or anybody else.  
14

15  
16 Amber is not calling any more men and talking to them about this  
17 case and listening to their sexual harassmt or their outrageous  
18 opinions.  
19

20  
21 Willam Paoli is a racist and called amber a tar baby many times  
22 when he screamed at her because he said he could not control her.  
23 He was only covering the fact that he was stealing from her and  
24 intentionally destroying her case while she was fighting the health  
25 battle.  
26  
27  
28

1 The lawyers at Glaser Weil were not honest with Amber about the  
2 legal process. They stated that the only evidence to be submitted  
3 at trial were the contract and the communications.

4 Diane Doolittle contacted Patricia Glaser and asked for another  
5 chance to mediate prior to a lawsuit being filed Amber went to two  
6 mediations where she was left in the mediation room alone with the  
7 rapist for a great many hours.

9 The first mediation Amber agreed that Michael Goguen could pay less  
10 if he stopped hurting her.

12  
13 Goguen then said there was another stalker stalking Amber and  
14 that Goguen would take Amber to the police to report the unnamed  
15 stalker/hacker. And that Goguen would pay for a body guard that he  
16 would control to be with Amber 24/7. Amber declined and asked  
17 Goguen for the name of the alleged stalker. Goguen refused to  
18 disclose his name. Amber learned over a year later that his name is  
19 Brian Nash.  
20

21  
22 The second mediation Michael Goguen continued to sexually harass  
23 Amber demand arbitration and treated amber with the idea that  
24 Rivers Morell would sue Amber because they made her fire Rivers  
25 Morell even though Amber had pleaded to go to mediation with Rivers  
26 Morell, Diane Doolittle and Michael Goguen. Michael Goguen stated  
27  
28

1 he would take on all Liability of forcing Amber to Fire Rivers  
2 Morell.

3  
4 Nobody told Amber the discovery process, nobody told Amber what to  
5 expect during litigation , nobody said the entire world was a  
6 witness that every person Amber ever spoke to for 5 min would be  
7 stalked and threatened. Victims do not have \$1200.00 per hour to  
8 pay lawyers to help them stop Goguen from stalking them and  
9 violating their rights of privacy and medical privacy.  
10

11  
12 When the complaint was filed in 2016 Patricia Glaser was in  
13 Israel unbeknownst to Amber.  
14

15 Amber had gone out of the country to visit a dying relative.  
16 Michael Goguen tracks her every movement and had Amber put on a  
17 terrorism list and looked her out of the United States. For some  
18 reason Goguen And Diane Doolittle are of the belief they can  
19 tamper with government proceedings and change Ambers nationality.  
20 By right of Birth Amber is a dual citizen of the United States and  
21 Canada  
22 Amber has spent more of her life in the United States than Canada.  
23 He Grandparents are US citizens and have always had US passports  
24 her great grandparents and great great grandparents were US  
25 citizens Amber's biological father upon information and belief is a  
26 US citizen by birth.  
27  
28

1  
2 Amber does not know all of her relations and has no desire to meet  
3 them. Amber does not know why Michael Goguen and his agents are  
4 tampering with Terrorism lists and US immigration the CIA the FBI  
5 and the Police.  
6

7  
8 Canadian Citizens are allowed to live in the United States without  
9 any type of visa, they have to only apply for a work visa if they  
10 want to work.  
11

12 Canadian's and US citizens can commute across the border frequently  
13 and live in either country 6 months of the year. Amber does not  
14 know why Michael Goguen is telling the government to prosecute  
15 Amber for living in America.  
16

17  
18 This is just more of Goguens abuse he uses all of the same tacts to  
19 abuse me as the traffickers did. He is a Romeo pimp a Romeo rapist  
20 who repeatedly told me He was abusing me and keeping me in an  
21 emotional cage because that is what he does when He loves  
22 something.  
23

24  
25 Even though i am dehumanized i was never an inanimate object I have  
26 always been a human being not a blow up doll. Amber is not a THING.  
27  
28

1 Michael Goguen went to Canada within weeks of Judge Chao's  
2 illegal judgement Michael Goguen was within meters of Ambers  
3 relatives and their small children. Michael Goguen is a very evil  
4 human being. His only purpose in Canada is child sex tourism and  
5 killing beautiful Grizzly bears and other endangered wild life for  
6 sport.  
7

8  
9 At the second mediation after Michael Goguen began his diatribe  
10 of abuse Amber splashed approximately 3 ounces of water on his face  
11 in hopes of stopping him from continuing to abuse her. Amber was  
12 under distress being in a room mediating the lawsuit with the  
13 rapist.  
14

15  
16 Diane Doolittle in her very disturbed personality came upstairs  
17 and photographed the water on his shirt as if he was injured.

18 Doolittle then told him to leave and ended the mediation.  
19  
20

21 Amber paid \$12,000.00 for each mediation where she tried to  
22 resolve the issue with as little damage to her person as possible.  
23 The mediator made a mediators proposal which Amber accepted.  
24 Michael Goguen later accepted it.  
25  
26

27 Months passed and he did not sign the papers Diane Doolittle  
28 stated it was too much that they agreed too.

1  
2 Judge Wayne from Jams was the mediator. Amber is not mad at judge  
3 Wayne. She did her best to deal with Goguen and Doolittle's  
4 malice. She was very kind to Amber and spoke to her like a human  
5 being.  
6

7  
8 There after a lawsuit was filed in May 2016 Goguen had been  
9 stalking Amber for at least 4 years at that point. Amber never  
10 seen Judge Wayne again.  
11

12  
13 Michael Goguen hired men to follow Amber and wait outside her  
14 apartment follow her while walking the her dog follow her to the  
15 gym follow her to do her volunteer work finally Amber moved to the  
16 hotel and the men were constantly coming to the hotel to Stalk  
17 Amber.  
18

19 I do not know how many perverted men have been hired to follow me  
20 hack met amber with my existence.  
21

22  
23 I no longer live I only exists because of Michael Goguens abuse.  
24

25  
26 During the Litigation process 18 months into litigation Goguen  
27 sat down for his first deposition and committed perjury for days on  
28 end.



1 Bruce Van Dalseun. Goguen instead the deposition had to be in  
2 whitefish Montana for no legitimate reason HE and his lawyers made  
3 San Mateo the jurisdiction. Everyone except Amber and Abhay Kholsa  
4 travelled to Montana the deposition was in the Whitefish city hall  
5 I don't know why.  
6

7  
8 Amber was only allowed to listen on speaker phone which Diane  
9 Doolittle put on Mute most of the time and then Marked much of the  
10 transcript Attorneys eyes only and refuses to give amber the  
11 transcript or the video even though Amber is forced to represent  
12 herself.  
13

14 Bruce the other Bully from Quinn Emanuel who is dear friends with  
15 Chris Reynolds the creepy Stalker who victimized me my friends and  
16 relatives by stalking us relentlessly.  
17

18 Bruces Wife Yvette Van Dalseum Is A California Judge she is also  
19 friends with the stalker. Bruce Van Dalseum Whom Darcy calls Bruce  
20 "Vander Shit" for stalking him at work and at his parents homes and  
21 his friends offices people i have never even met. Doolittle alleges  
22 that i would have told a 23 your only gay boy that I met in the  
23 women's clothing section, where he worked at a store that I was  
24 trafficked and raped days after I met him.  
25  
26  
27  
28

1 Amber only knew Darcy a boy smaller in stature than myself for a  
2 few hours at the time of the rape after the rape I never seen him  
3 again until October 2013 at least 15 months after the rape. He flew  
4 to LA to see his boyfriend and Amber seen him for a few hours. At  
5 the time of the rape Darcy was in the middle east with his  
6 boyfriend. Diane Doolittle is willing to pervert the course of  
7 justice in any and every way possible and the only way they could  
8 have found out I met Darcy in a story was by hacking my phone or  
9 hacking my phone records. I never had any social media until this  
10 lawsuit in which Goguen hacked and locked me out of the accounts to  
11 silence me.  
12

13  
14 After the first day of Goguen's deposition in Montana Bruce took  
15 out a bike and fell off and broke his collar bone. That's what he  
16 said. He left the hospital and came back to the deposition he said  
17 he stopped taking the Oxycotin. Therefore Doolittle was the one  
18 making "objects" and suborning the perjury. Goguen had 5 days of  
19 deposition coaching in Vegas with multiple firms. He did not appear  
20 for his deposition until nearly 18 months into the case Amber  
21 appeared the month after the case was filed. I can only estimate  
22 because I don't have all of the files.  
23

24  
25 During his perjured deposition Goguen stated he did not know if it  
26 was possible to delete an email account he controlled the accounts  
27 in which he communicated with Amber. He then lied and said the only  
28

1 females "sex partners" were a short list yet its thousands. Quinn  
2 Emanuel refuse to produce Michael lewis Goguens Deposition  
3 transcript or video because they suborned his perjury.  
4

5 Diane Doolittle called third parties to ask why Michael Goguen  
6 was in her office with prostitutes wearing short skirts with no  
7 bras and not panties. Why is there any dispute or question  
8 lingering that Goguen rents prostitutes. He is a rapist a  
9 trafficker a pedophile and a serial rapist and a murderer.  
10

11  
12 Goguen deleted them after the Subpoena was served for the contents  
13 of the accounts.  
14

15  
16 Goguen left the deposition room after lying about having no  
17 knowledge of how to delete an email account although he claims he  
18 created the internet. He then returned and said he cleaned out all  
19 emails in the account destroying all of the evidence that proved  
20 there was no extortion. If Goguen was being extorted why didn't he  
21 and his lawyers preserve the evidence of the "extortion"  
22  
23

24 Michael Goguen stated that He was the only one who did any work  
25 at Sequoia capital and that he was stealing critical information  
26 and was secretly planning to leave Sequoia. He even wrote about it.  
27  
28

1 I was not paying attention when he wrote and said those things I  
2 only thought he was abusing and exploiting me I did not know he was  
3 having sex with his friends wives and daughters.  
4

5 I did not know that he was damaging his business partners.  
6

7 I did not know what Sequoia capital did exactly i did not think  
8 about it nor did I care. All i know was what Goguen said about his  
9 meetings. Some times he would sign on to conference calls in the  
10 hotel while nude rubbing himself.  
11

12 Amber was not allowed to wear any clothing or underwear in the  
13 room.  
14

15  
16 If he made any secret videos of him violating Ambers body Michael  
17 Goguen needs to give them to myself and law enforcement and nobody  
18 else can look at them. This is too painful.  
19  
20

21 Micheal Goguens Lawyers and Agents are not allowed to possess or  
22 watch any videos of Amber being raped. There are already in  
23 possession of child pornography of me in still images. Something  
24 Judge Chao does not view as a crime.  
25 Michael Goguen said that His business partner Named Michael was  
26 very sick and that when he dies Michael Goguen would be taking over  
27 Sequoia capital.  
28

1  
2 I do not remember what else he said about it at this time I have  
3 had to read what emails he did not destroy to understand what he  
4 was telling me. I don't know what secret information he took from  
5 Sequoia. I don't know if his partners died.  
6

7  
8 The only thing I know is Sequoia paid for my transportation, food  
9 and hotels where Michael Goguen raped me> They paid for the Notary.  
10

11 Sequoia Capital read all of the communications between Diane  
12 Doolittle Anthony Mcusker and Wilson, Sonsini Goodrich and Rosati.  
13 Everything else they did is for proof at trial.  
14

15  
16 The agreement specifically stated that if Michael Goguen were to  
17 materially breach the agreement the harm to Amber would be  
18 Irreparable.  
19

20  
21 Now the damage to Amber is incompressible.  
22

23 Michael Goguen threatened that if he could not remain a part of  
24 Ambers life until the day she dies he would hire someone to follow  
25 her everywhere she goes this is the only promise he has ever kept.  
26  
27  
28

1 During the deposition he sated he has never hired a prostitute has  
2 never had sex with teenagers and that Matthew Marshall Michael  
3 Goguens head of Security knew nothing about Amber besides what he  
4 seen in the news.

5 Yet Matthew Marshall States he has known about Amber since the  
6 beginning and Goguen Paid him to hire men to stalk Amber and  
7 Michael Goguen solicited Matthew Marshall first for Amber's murder.

8  
9  
10 Amber does not know why Mathew Marshall is in Jail for all of the  
11 crimes Michael Goguen paid Matthew Marshall to commit. Amber has  
12 never met Mathew Marshall.

13  
14  
15 Amber found out about him from another victim. Amber told Brian  
16 Nash about Matthew Marshall and Brian Nash went to See Matthew  
17 Marshall.

18  
19  
20 Brian Nash stole \$20,000 dollars from Amber to obtain the emails  
21 that Michael Goguen destroyed so that Amber could present the  
22 evidence in court. Amber believes he used the Money to buy his  
23 second wife's wedding ring.

24  
25 Brian Nash Extorted Amber. He demanded she Buy him a Mercedes  
26 Motor home and that she give Brian Nash 2 million dollars for no  
27 reason even though Brian Nash stated he is some type of investor  
28

1 and that Sequoia Capital wanted Brian Nash to take on Michael  
2 Goguens Position after they fired Michael Goguen for raping Amber.  
3 Brian Nash says Goguen prevented Nash from working at Sequoia  
4 decades ago and that Brian Nash's step father is friends with the  
5 founders of Sequoia Capital. And something about Chris Skirakis a  
6 founder at Google. I don't know. Brian showed Amber a video of  
7 Chris Stalking him at the grocery store.  
8

9  
10 Brian Nash says he has a trust fund so Amber does not know why he  
11 was extorting her. He has adult children. Amber had zero knowledge  
12 of Brian Nash, Stephanie Nash or any of their lovers or associates  
13 prior to September 2016. Nash contacted amber under alias justice  
14 masses he contacted Patricia Glaser and Rivers Morell.  
15  
16 Amber has no idea why Goguen and Jamie Stephenson publicly state  
17 Amber Brian and Matt all knew one another since the 2000s and  
18 conspired against Goguen. Goguen is the common denominator in all  
19 of these horrible situations that he created. Because he is a  
20 Psychopath.  
21

22  
23 Sequoia Capital Has Been aware of Goguen Sex enterprise since  
24 the 1990s if Sequoia Capital had done something about this Amber  
25 would not have been raped, abused and trafficked by Michael Goguen.  
26 Many other victims called Sequoia Capital and complained about  
27 Michael Goguens abuse. One of his first victims boyfriends put a  
28

1 live bomb threat on Sequoia Capital and Sequoia was evacuated and  
2 they still rectified Goguen sex enterprise. They were co-  
3 conspirators in Goguen sex enterprise. Goguen told Amber about  
4 them. Amber is so used to the deleterious behavior of men she  
5 didn't think much about his partners and what they were doing to  
6 women.  
7

8 Amber only heard of Brian Nash in the fall of 2016. Brian Nash  
9 contacted Amber anonymously after Patricia Glaser abandoned Amber  
10 and she was in Europe searching for medical records from years  
11 before that she never had in her possession.  
12

13  
14 At least 60 people that have met Amber have been stalked and  
15 trespassed upon by Michael Goguen's Agents hired by him, his staff  
16 and his lawyers.  
17

18 People have had to relocate from their homes. Goguen and his  
19 agents have stalked elderly people dying in hospital some going  
20 through cancer treatment at hospitals They have gone to the doors  
21 of women who are single mothers who have told them yes there is an  
22 organized crime syndicate that did this to her.  
23

24  
25 The stalkers are at peoples doors talking about my sexual  
26 exploitation in from of peoples minor children that are part of my  
27 life. Other people never know any of this took place i never spoke  
28



1 about any of it to anyone it only hurts more. I just try to help  
2 other girls and women save their lives and get to safety.

3  
4 They victimized my all of my siblings elementary school aged  
5 children and toddlers.

6  
7 Nobody feels safe in their homes offices or cars. Amber Tried to  
8 protect everyone from the crimes committed against her.

9  
10 Some people came long after I paid my debt bondage and was in  
11 hiding. They did not know of this or anything about Goguens abuse  
12 they had never heard of him before.

13  
14  
15 The amount of damage done no money can ever repair I have not seen  
16 my friends or family in over 5 years. As long as Amber is a target  
17 nobody who loves me is safe.

18  
19  
20 The San Mateo judiciary forced me to disclose the name of the  
21 organized crime syndicate and specific traffickers, witnesses  
22 confirmed that it is true and some of the witnesses are front men  
23 for the Gang, Goguens investigators went to the doorsteps of Pimps  
24 and traffickers dangling money and Ambers photos and stated that  
25 Amber has 40 million dollars. I do not know how much bribe money  
26 has been paid by Goguen and Quinn Emanuel to witnesses.

1 I am now in danger 24 hours per day 7 days per week 365days per  
2 year. The Syndicate will kill me to stop me from speaking about  
3 their activities I went to the special victims units the detectives  
4 state they know this is happening however the government makes it  
5 nearly impossible to have them charged with human trafficking so  
6 they try to arrest them on drug trafficking and murder.  
7

8  
9 I asked for witness protection if I cooperated and would testify  
10 they said that is unheard of that i should hide in a small town for  
11 the rest of my life and forget what happened that these are now  
12 historical crimes. I said they are still doing it. i know girls who  
13 were murdered or overdosed and never had a chance a freedom. None  
14 of this is historical to me. It's been an entire lifetime of abuse  
15 that never ends.  
16

17  
18 Diane Doolittle is the ring leader in all of this. I reported her  
19 to the State Bar years ago and she had the report deleted. People  
20 can not tamper with government agencies.  
21

22  
23 We are all sharing this world together.  
24

25 I did not know a lawyer could just abandon your case when it is set  
26 for trial  
27  
28

1 Patricia Glaser did not tell me at the inception of hiring  
2 her that over half of my legal team were former QUINN EMANUEL LLP  
3 ATTORNEYS AND THAT DIANE DOOLITTLE WAS THEIR BOSS. BY LAW THIS fact  
4 NEEDS TO BE DISCLOSED AND PUT IN MY RETAINER AGREEMENT.  
5

6  
7 When Patricia Glaser filed the lawsuit Goguen was terminated by  
8 Sequoia Capital Immediately as they know they ratified his behavior  
9 and were participants in Goguen Sex Enterprise.  
10

11 MICHAEL Goguen solicited Girls and women for other men to exploit  
12 and abuse they all travelled for sex tourism together.  
13  
14

15 I don't know how Goguen purports he has never rented a prostitute .  
16 He is in Strip clubs most days of the week having sex in the back  
17 room within minutes and ordering females to his room and residence  
18 for sex, rape and orgies.  
19  
20

21 If Goguen was not paying me for commercial sex acts so that i  
22 could go to university I have no explanation for what he was paying  
23 me for. He said it was my job thats why I had to endure the violent  
24 demanding sex acts. It was my job to provide him with as many  
25 beautiful photos on demand for his private collection.  
26  
27  
28

1 I have no idea why a billionaire was making me not have food and  
2 fly on Southwest for \$79.00 to all these destinations sometimes I  
3 had to take 2 or 3 flights I would be so exhausted and the sodomy  
4 would commence upon arrival. He started screaming at me one time  
5 for wearing pajamas when it was cold in the middle of winter in  
6 Toronto. He was hiding in the closet at the rosewood sand hill when  
7 the guy came with the room service he ordered. He always ordered  
8 cheese burgers. I was allowed to eat only when he would leave the  
9 room to go to his office or his house in Atherton. I was never at  
10 his house. After the guy delivered the food Goguen was screaming at  
11 me because the guy asked me what City I lived in and I said L.A  
12  
13

14 .  
15 That stands to be a normal question. The Guy was just being polite  
16 Goguen said I should have told him something else. i don't know  
17 what difference it would have made. The guy was not asking because  
18 he would have care if Goguen had actually spoken to him. He was  
19 inquiring about me. Its Goguen's narcissistic psychopathic mind  
20 that leads him to believe he is so important that the man  
21 delivering his food would be at all interested in him.  
22  
23

24 When he really began destroying mY body not just my mind he made  
25 me set up companies to receive the money.  
26  
27  
28

1 Amber had never heard of an LLC or a 501 C 3 company. i did not  
2 know what legal zoom was he instructed me to do this and then  
3 wanted me to sent up a 3rd company a charity to receive the money  
4 for the personal injury settlement. This is all in evidence.  
5

6  
7 I didn't know why he said the companies were for my privacy in  
8 his deposition. He has an entire tax evasion scheme going nation  
9 wide and across international borders.  
10

11 Why would Amber need a company for her privacy the bank  
12 statement still says Michael. L. Goguen trust and Valley Oaks LLC.  
13 Nobody was looking at my banking besides The bank and Myself. So  
14 where was he protecting my privacy? More perjury and suborning of  
15 his perjury. He wasn't, was not at all concerned about protecting  
16 Ambers privacy, Goguen was hiding Goguen sex enterprises from the  
17 Government and I don't know who else.  
18  
19  
20  
21

22 Goguen has married 3 prostitutes two from Las Vegas one from the  
23 Gold Club in Atalanta which was shut down for human trafficking and  
24 racketeering. Why Diane Doolittle is blaming Amber that Goguen  
25 divorced Jordana Woodland when Amber never spoke to Jordana  
26 Woodland or contacted her in any way at any time to this date. He  
27 had All is prostitutes traveling to Two Bear ranch and living in  
28

1 guest houses apartments and hotels in Whitefish Montana when he  
2 decided to get a divorce for Jordana Woodland in Augusta 2014 after  
3 the agreement was signed he called Amber told her about the divorce  
4 and said he was planning to resume sodomizing Amber.

5 Amber said no.  
6  
7

8 Jordana Woodland knew about Goguens Harem he has 3 of his wives  
9 living in Whitefish Montana. Jordana Woodland did not have any  
10 knowledge of Amber. Amber found out about Jordana Woodland Because  
11 she was prancing around in skimpy clothing and in Ambers  
12 neighborhood with men and and going out to bars in mini skirts  
13 while heavily pregnant she was announcing herself As Jordana  
14 Woodland- Goguen.  
15

16  
17 She knows some people whom Ambers knows through the fashion  
18 industry she has paid them hundreds of thousands of dollars to make  
19 her seem famous. Weird. Goguen said he married a famous Hollywood  
20 Movie star. Clearly Jordana Woodland is not a movie star nor is  
21 she a super model as Goguen repeatedly stated. She paid for  
22 Billboards of herself in panties to be hung up around Ambers  
23 neighborhood. Goguen said Amber had to move to another city or  
24 country. The only film she was in to Ambers knowledge is a comedy  
25 that Goguen funded about teenage Escorts glorifying the sex  
26 trafficking industry. Super models are defined as people who earn  
27  
28

1 10 million dollars or more per year in ad campaigns or fashion  
2 shows. Jordana Woodland was never a fashion model nor a Hollywood  
3 actress she was a stripper and escort in Las Vegas until Goguen  
4 Married her while he expanded Goguen Sex enterprises. She attempted  
5 to be a reality star and internet influencer.  
6

7  
8 I have nothing against the women I just don't want to be in a harem  
9 with her or any of them. I never agreed to any of this. Polygamy  
10 and harems are illegal in America. None of these women and I would  
11 ever be friends or palling around together. The only one I have met  
12 in person was Jamie Stephenson when she was blocking the doorway to  
13 the court room in San Mateos and an intimidation tactic. These  
14 females have completely different ways of living life. How anybody  
15 invest in Montana in the concubine is beyond my comprehension.  
16

17  
18 Michael Goguen kept a spread sheet of 5000 of his victims. He  
19 showed it to 3rd parties because he is a very sick and depraved  
20 psychopath.  
21

22 Some of his victims he had procure younger girls that would do  
23 anything he wanted sexually. Theses women are full time prostitutes  
24 dozens of them have called me. None of them deny being prostitutes.  
25 They have various reasons why they are prostitutes. He frequents  
26 various types of brothels. So far none of them stated that he met  
27 them on a street corner he orders escorts from agencies. He rapes  
28

1    them violently because he knows the police will side with him.  
2    Which is wrong.

3

4           None of them believe themselves to be victims of human  
5    trafficking. I assume because of the brain washing. Goguen has paid  
6    their pimps to silence them and keep them complicit several of them  
7    have stated they are now homeless because of Michael Goguen.

9

10           When he can no longer abuse us he just tosses you out to die.  
11    Some of them state they work street corners and work in escort  
12    agencies. They do not think they are victims of human trafficking  
13    when their pimp is their husband or their fathers child.

15

16           I have no clue why a judge is willing to violate the law of the  
17    land and prevent me from providing this evidence in a court of law  
18    just because they were bribed by Goguen.

19

20

21           Evidence is not defamation. Providing evidence is not extortion  
22    providing evidence is part of the criminal and civil justice system  
23    you can not silence victims from providing evident to the court. If  
24    these pedophiles don't want to be "defamed" they should stop raping  
25    girls and women. There is no cure. They should get the electric  
26    chair how many girls and women do they have to rape before  
27    something is done to stop them?

28



1 RAPE IS CRIME, HUMAN TRAFFICKING IS A CRIME, PEDOPHILIA IS A CRIME  
2 THE DOJ IS NOT JUST FOR SHOW IT IS FUNDED THROUGH TAX DOLLARS SO  
3 ARE THE JUDGES.  
4

5  
6 These judges need to be disciplined and removed from the bench  
7 immediately. They can not violate victims rights and the rights of  
8 society as a whole. If rapists were stopped at victim one there  
9 would be zero serial rapists, Zero serial killers.  
10

11  
12 Castration is an option. But they would then just murder girls  
13 and women.  
14

15  
16 Shortly after the Lawsuit for breach of contract was filed in  
17 2016 Patricia Glaser began charging me approximately 10,000.00 per  
18 day everyday of the month to read documents. One lawyer went to one  
19 short hearing for less than an hour.  
20

21 Glaser Weil filed a massive motion to compel discovery around  
22 the same time as they filed the motion to withdraw. Amber was left  
23 in Pro Per in a foreign country being stalked and hounded by  
24 Michael Goguens henchmen.  
25

26  
27  
28 They chased Amber through 4 different countries.

1  
2 After Patricia withdrew from Ambers case for no reason other  
3 than I could not pay \$10,000.00 per day for them to read documents  
4 the motion to compel was heard. I appeared via court call.  
5 The Judge stated there was nothing to compel as Patricia Glaser had  
6 not served written discovery. Which Amber asked her to serve Jill  
7 Basinger said it was optional and their firm did not serve written  
8 discovery they only ask questions at depositions.  
9

10  
11 A couple of days after the lawsuit was filed in 2016 Jill  
12 Basinger called Amber and said Patricia was in Israel that Diane  
13 Doolittle wanted me to pull the complaint before the press got it  
14 and that they would pay what was owed plus interest under the  
15 contract. I said no because I wanted to speak to Patricia she was  
16 the only one I thought i could trust. Jill Basinger said it was  
17 night in Israel and we could not call her so i am put on the phone  
18 with Diane Doolittle and Jill  
19  
20

21  
22 Diane Doolittle was her usual mean self.  
23

24 Diane Doolittle Leaked the Complaint to the press so there was  
25 nothing i could do at that point.  
26  
27  
28

1 Amber asked Patricia to resolve the issue between Rivers Morell  
2 and Myself I asked if we could call him together so I could explain  
3 what happened she said no.  
4

5 Patricia called Rivers. I do not know what was said. Rivers  
6 Morell did not go to fee arbitration rather he filed a 100 million  
7 dollar lawsuit in Orange County against Myself, Goguen and Quinn  
8 Emanuel, Goodwin Procter Diane Doolittle and Michael Goguens other  
9 lawyers of which there is an army.  
10

11 I don't know any innocent man would need fifty eight or more  
12 lawyers from seven white shoe law firms.  
13  
14

15  
16 When Rivers Morell filed his lawsuit in Orange County Patricia  
17 stated she does not represent me against Rivers, That I need a  
18 second law firm. I was very very distraught and did not understand  
19 anything that was happening. It might have been Jill who elucidated  
20 it. They often called me in Tandem.  
21

22  
23 The first image of me printed by the traffickers for the  
24 marquee said had this text on the Image "I am not a lawyer but I  
25 can get you off."  
26

27 I did not know what that meant or why they put those words on  
28 my 8x10. The traffickers did whatever they wanted. They tried to

1 sell me to porn films I fought them about it for years, if they  
2 made me cry everyday they could not get as much money from  
3 exploiting me. So they didn't bring it up everyday only when the  
4 porn movie recruiters were coming.

5 The traffickers have lawyers and illegal contracts as well.  
6  
7

8 Amber would often be in the bathroom or the dressing room  
9 crying. I would take a nap in the non smoking room under the table  
10 the bouncers would come find me if i was asleep to long. Bouncers  
11 were part of the Gang. They were not there to protect us girls.  
12  
13

14 A Long Nap being more than 30 mins. They knew they would find me  
15 trying to breath in the no smoking room. Amber had to inhale so  
16 much second hand smoke that I would have nicotine withdrawals when I  
17 was not in the clubs. I do not remember a day that i have not had a  
18 headache.  
19  
20

21 After Patricia's motion to withdraw was granted. Amber began  
22 interviewing lawyers via video call. Nobody wants to deal with  
23 Diane Doolittle specifically because she has zero legal ethics.

24 Judges should not be allowed to abandon victims of crime/  
25 unsophisticated parties when a trial is set and the plaintiff has  
26 no new counsel in place. Victims are not lawyers. This is never  
27 allowed in most other countries. Lawyers are bound to duty and a  
28

1 code of ethics. Victims do not know how to direct lawyers. Nor  
2 should they be expected to. Victims are under duress its the  
3 lawyers job to be their advocate. business lawyers should not be  
4 representing rape victims.  
5

6  
7 Amber has no idea why Quinn Emanuel is alleging Amber is the  
8 sophisticated party. When Quinn Emanuel has 1200 lawyers Goguen has  
9 them and 6 other firms working for him he has been in countless  
10 business and personal lawsuits and three divorces. Goguen has  
11 Business contracts for illegal dealing that interfere in government  
12 matters. Three prenuptial agreements housing contacts and an  
13 unfathomable amount of non disclosure agreements for destroying  
14 women's bodies and minds.  
15

16  
17 All with highly trained lawyers and he himself claimed he could  
18 be Ambers lawyer. When he has no license to practice law. Amber  
19 believed him because she conjoined this to the idea that a person  
20 can with have a real estate agent with a license or they can  
21 represent themselves and make an offer on a property themselves.  
22 Amber believed that what Goguen said was true that Goguen and his  
23 lawyers could represent her and the agreement was the best  
24 possibility for Amber to be free from abuse exploitation, have  
25 shelter and medical care.  
26  
27  
28

1 Rivers Morell found several lawyers for Amber after Patricia  
2 Abandoned Amber .

3  
4 Amber hired Brian Chase. He drinks heavily and smokes cigars.  
5 Brian Chase made a deal after a short time to abandon my case  
6 leaving me in Pro per again. He took bribe money from Michael  
7 Goguen a short time after Goguen offered Rivers Morell 1 million  
8 dollars to disappear.  
9

10  
11 Brian Nash had come on the scene by by September 2016. After  
12 Michael Goguen had written a fee agreement that allowed Michael  
13 Goguen the predator to pay Brian Nash to hurt Amber.  
14

15  
16 Brian Nash is Michael Goguens ex-best friend He attended  
17 Goguens weddings. Goguen showed him pornography of his wives.  
18

19  
20 Goguen began Having sex with Brian Nash's first wife Stephanie and  
21 paid for lawyers to Destroy Brian Nash's career and his marriage  
22 and take Nash's children away from him. All of the victims refer to  
23 Goguen as the predator.  
24

25  
26 Brian Nash Contacted Michael Goguen when he learned of Ambers  
27 lawsuit and stated for a fee of 15 million dollars he would help  
28

1 Michael Goguen destroy Ambers life. Brian Nash states Goguen shared  
2 Child pornography of amber In the early 2000's  
3 Brian Nash wanted 15,000,000.00 to work as a consultant for Goguen.  
4 So Goguen could "restore his reputation"  
5  
6

7 Amber asked Nash why he did that. He said he didn't know about  
8 amber he assumed she was one of Goguens full time prostitutes. He  
9 did not know anything about her life. He apologized. Amber asked  
10 why would you help him hurt anyone stop being doing things like  
11 this just forget about the predator.  
12  
13

14 Amber did not know what reputation he was going to restore. It is  
15 public knowledge that he is a rapist, pedophile and sex trafficker.  
16 He was a pedophile who had sex with his teenage babysitter long  
17 before he was raping Amber.  
18  
19

20 Michael Goguen again prepared his agreement with his lawyers and  
21 did an illegal police sting On Brian Nash and never wired the Money  
22 to Brian Nash. Brian did not tell Amber any of this when he  
23 contacted Amber the first time after Patrica Glaser abandoned Amber  
24 in Pro Per. He said his name was JUSTICE masses.  
25  
26  
27  
28

1 Amber did not know Brian's name I did not know what he looked  
2 like. He sent me a photo of him in the 1970s with long hair and a  
3 1970s suit after time passed.  
4

5  
6 After calling Amber for awhile Brian Nash stated he was in love  
7 with Amber. He stated on multiple occasions that he had conflicted  
8 feelings.  
9

10 Amber told Nash that is impossible you have never even met me.  
11 I told him not to say that ever again and that he had to marry  
12 Kelly. He insisted on telling me this love idea repeatedly. I said  
13 Nash I am never going to be in Love with anybody and I am not  
14 marrying any men.  
15

16  
17 Nash is traumatized by Goguens psychotic behavior. Brian Nash  
18 used to go to strip clubs with Goguen where Goguen would disappear  
19 with the youngest girls he could find to have sex with them in the  
20 back room. Nash did not participate.  
21

22 Nash used to cash Goguens expense checks for him so his first  
23 wife would not know how much money he was spending on prostitutes.  
24

25 Amber is not a sexual person. Amber is Not a lesbian, Amber is  
26 not Bi- sexual I am not a sexual at all.  
27  
28



1 I don't even have a sexuality the only thing I know is about  
2 sexuality is Goguen holding his penis in his hand and using it as a  
3 weapon. I have never heard of anyone violating 5000 women.  
4

5 I don't understand, isn't all sex the same why would any person  
6 even a rapist need to violate 5000 humans.  
7

8  
9 Amber is a victim of human trafficking I have complex PTSD and  
10 a parasomnia, from the abuse. I have HPV. Michael Goguen ripped a  
11 hole in my body and now Tungsten poisoning.  
12

13  
14 Why in the universe would Amber contemplate being in love having  
15 a child or marrying a man. Thats outrageous its all of them who did  
16 this to Amber.  
17

18  
19 Amber told Brian Nash several times to just stop thinking about  
20 her case and my life and to stop stalking Goguens victims and not  
21 to be a vigilante. I understand that Michael Goguen destroyed Brian  
22 Nash's life but I didn't want Goguen to kill Nash.

23 Michael Goguen never mentioned Brian Nash's name to Amber.  
24

25  
26 Goguen told Amber all about his friend Tom's violations of  
27 women. Brian Nash is not a rapist or a psychopath he is just a  
28 victim of Goguens Sex Enterprise and abuse and stalking.

1  
2 Brian Nash Hired Rivers Morell to represent him in his breach  
3 of contract. Amber asked Brian not too. He then had phone  
4 conferences with Brian Chase, Rivers Morell and Alan Brown.  
5

6  
7 Brian Nash did horrible things like filing their lawsuit on the  
8 morning of my deposition causing me further distress while being  
9 grilled for hours on video about every aspect of anal rape alone in  
10 a room with the rapist and 6 or 7 men that Amber does not know.  
11 They were all sharing evidence from my case. I asked them to stop.  
12 Every man does anything they want to exploit me. I say NO they do  
13 it anyway.  
14

15  
16 Some how Brian Nash at some point decided that of  
17 \$40,000,000.00 owed to Amber : she would have 10 million Rivers and  
18 Alan would have ten million and Brian Nash would have 10 million.  
19

20 Amber is not clear as to why every man on this planet believes  
21 Amber owes them money merely because she is alive.  
22

23 The dozens of hours of depositions which Patricia Glaser promised  
24 Amber would only be 7 hours on the record are sexual harassment.  
25 The lawyers take so many food breaks so they can bill more and more  
26 hours. Amber does not want to eat in front of people who have  
27 dehumanized her.  
28

1  
2 I don't know why any lawyer is alleging that my photo on a beach  
3 in a swimsuit somehow caused Goguen to rape me that is outrageous  
4 Females not cause rape. Rapists perpetrate rape because they are  
5 demonic psychopaths. Amber has no idea what is wrong with men.  
6 There are a very small number on the planet that are not satanic.  
7 They are wolves in sheep clothing. I can attest to this because I  
8 had to speak to hundreds of thousands of the. I did not keep count  
9 but a great many. I wish now I would have counted.  
10

11  
12 Diane Doolittle is a female misogynist representing several of  
13 these rapists and telling us plaintiffs that we have no rights and  
14 the rapists have the right to rape us and she will exploit that  
15 for her profit.  
16

17  
18 Amber is not the first female Diane Doolittle has done this to  
19 but I pray i am the last. No person deserves her abuse in addition  
20 to the rape and trafficking.  
21

22  
23 How would Diane Doolittle like it if her clients raped her? I am  
24 sure they would not want to because she is so evil. Her eyes are  
25 vacant.  
26  
27  
28

1 Amber am not mad at Patrica Glaser I thought she was a nice  
2 lady. I am sad she just abandoned me in this mess to go represent  
3 rapists and pedophiles because they can pay her more.  
4

5 I think Patricia has enough money and should only help other  
6 victims for the rest of her career because they need help. They  
7 don't want to speak to any male lawyers.  
8

9 That is second hand rape These Lawyers they are all perverse  
10 Voyeurs  
11

12 Lawyers in Canada, France and England are not allowed to  
13 terrorize victims on video for endless hours for blood money and  
14 filthy lucre.  
15

16  
17 The only time they can examine a witness is at trial on the  
18 witness stand. Diane Doolittle should not be a lawyer any more  
19 because she is a stalker and a criminal perverting the course of  
20 justice. The rest of the lawyers have to have trials before the  
21 state bar court. The problem is they work at the state bar. This is  
22 all so corrupt. She is far more than unethical.  
23  
24

25 After Michael Goguen and his Lawyers bribed Brian Chase to  
26 abandon Ambers case so they could win while Amber was in pro per  
27  
28

1 Rivers introduced me to Richard Sherman who did very unethical  
2 things to me.

3

4 Richard Sherman then withdrew after being very lazy, making Abhay  
5 Kholsa do all of the work for little salary and asking Amber to pay  
6 hundreds of thousands of dollars in legal bills for his clients  
7 that Amber did not even know in completely unrelated cases.

8

9  
10 Amber refused so Richard Sherman lied to the court and stated  
11 that we had an attorney client breakdown. When a trial date is set  
12 in Common law countries the Judge can not allow a lawyer to abandon  
13 the case. They have a fiduciary duty.

14

15  
16 As the judges set such a low standard of ethics for the Lawyers  
17 in this case By allowing Glaser Weil to abandon my case every  
18 lawyer there after thought they could stay not do their job and  
19 just abandon me in this horrible situation.

20

21

22 Quinn Emanuel perverted the course of justice in every way  
23 possible. I am still researching all of their violations that I  
24 have evidence of.

25

26

27 The only thing I can tell myself everyday is that today nobody  
28 raped you today, nobody beat you today, nobody made you Drink Urine

1 today, you are not hemorrhaging today, What type of existence is  
2 that for any human being?

3

4 They breached the protective order multiple times further  
5 endangering Ambers life.

6

7 I did not know what a protective order was when Patricia Glaser  
8 told me I was getting one I though it was an order of protection to  
9 protect me from the stalking.

10

11 Michael Goguen did not turn over a single piece of relevant  
12 evidence in the case. He committed perjury time and time again and  
13 Quinn Emanuel Suborned the Perjury and manipulated his testimony.  
14 Diane Doolittle called witnesses to ask why Goguen had prostitutes  
15 without bras or panties in short skirts at her office.

16

17  
18 Goguen Stated multiple times that Diane Doolittle is evil and  
19 coin operated and that the Lawyers are my adversaries and Amber had  
20 to depend on his knowledge to save my life.

21

22  
23 All Doolittle has done is manipulate testimony cut apart my  
24 testimony and spliced it together to suit her evil plan. She fed  
25 witnesses their testimony and told them what they had to say at  
26 deposition. Diane Doolittle made unethical interjections and  
27 objections during cross examinations of witnesses she had coached  
28

1 during their depositions. Diane Doolittle and Bruce Van Dalsuem do  
2 not represent the witnesses they tampered with.

3  
4 In year 2017 because of the stress and being stalked and chased  
5 by Michael Goguens henchman investigators relentlessly. I fell and  
6 shattered my arm I am left handed I shattered my left arm. The only  
7 job I am certified to do I can never do again as my arm will never  
8 be whole again.  
9

10  
11 The Quinn Emanuel lawyers alleged that Amber imagined the arm  
12 injury or faked the injuries. Because they are evil. They would not  
13 even give Amber peace to undergo surgery.  
14

15  
16 Yet the "lawyers" delayed the trial for their injuries and  
17 holidays and their other trials but Amber is not a human she should  
18 perform under all circumstances on command even in a court of law  
19 like a circus animal. Amber is a shy person by nature. I do not  
20 like witness stands nor do i like sitting in rooms with male police  
21 talking about rape.  
22

23  
24 The expert witness was flying to assess Amber the day the arm  
25 shattered and Ambers friend was being deposed in LA so Amber sat  
26 through the deposition on the phone so they would not hurt him. He  
27  
28

1 is sensitive and homosexual and had zero knowledge of any of this  
2 rape and human trafficking.

3  
4 Quinn Emanuel do not have the right to violate these innocent  
5 people. Some gay people are in the closet because of the stigma and  
6 gay bashing so what do Quinn Emanuel do? Stalk them at home and at  
7 work and threaten them with exposing their sexuality. That is  
8 cruel.  
9

10  
11 Just as Diane Doolittle extorted Amber by saying if I went to  
12 trial she would shine a spotlight on me and show people my photos.  
13 I did not know she could put my photos on the news. She did it  
14 because she is a criminal and a heartless evil women.  
15

16  
17 I don't want to be forced to look at her anymore it was the most  
18 unfathomable displeasure to meet such type of woman.  
19

20  
21 All of this is cruel and unusual punishment for my being born a  
22 female.  
23

24 Frank Nemecek had the audacity to write to me stating that I am  
25 the perpetual victim, if 58 lawyers would stop exploiting me and  
26 profiting from my circumstances of rape and human trafficking then  
27 they would not have to hear any of this and now that they have  
28



1 plastered them selves all over my destiny All I can do is ask the  
2 supreme court to stop them from harming me.

3

4 This is egregious. I can't even expound on what I feel I can't  
5 cope under these circumstances. I don't know who could, it is like  
6 having invasive brain cancer to have these people invade my mind.  
7

8

9 Amber has panic attacks day and night day and night, even when I  
10 sleep I wake up screaming.

11 I only get to sleep when profound exhaustion takes over. I don't  
12 know why any of this is happening I was going to be a doctor that  
13 was my plan from age 6. I was a volunteer even as a child and I  
14 would go to sing for people as a tiny child. Now all I do is try to  
15 breath. I can't digest food property I am poisoned with toxic  
16 metal.  
17

18

19

20 So now I am supposed to figure out how to sue surgeons and  
21 hospitals by myself. I am not a lawyer I never professed to have  
22 any desire to be a lawyer.

23

24 If I survive I am going to sit for the law in California so I  
25 can represent other victims and children for free because clearly  
26 they can not represent themselves and clearly they will be abused  
27 by lawyers and judges.  
28

1  
2 My life is not going to be in vain. I am a shy person. I always  
3 was and likely always will be. I was never an exhibitionist  
4

5  
6 I do not like people to look at me whatsoever because of this  
7 trauma, however even before the trauma I was extremely shy. I grew  
8 up very religious. I was isolated. I did not know what porn was I  
9 did not have an iPhone or internet or access to playboy magazines.  
10

11 I was taught how to waltz, play the piano play the flute,  
12 piccolo.  
13

14  
15 I was not allowed to go walking to the park alone. People  
16 always stopped and asked my grandfather where I was from and why I  
17 was beautiful. He said she is smarter than she is beautiful and  
18 they should not stare at me.  
19

20  
21 I went to convalescent homes to visit people all of the time to  
22 bring cheer to the dying. I was a volunteer at the homeless shelter  
23 and I went to put up hundreds of flyers when a girl went missing.  
24

25  
26  
27 After days passed I was crying hysterically and told everyone  
28 there is no point she is dead. Shortly after they found her body in

1 a shallow grave near my home the murderer was acquitted even they  
2 had his DNA and he confessed to raping and killing a child to his  
3 cell mate.

4  
5 This world is not a very good place if Judges do not uphold the  
6 law.  
7

8  
9 During the first surgery to repair my arm the surgeon left toxic  
10 metal in my bone marrow canal and he subsequently ended the surgery  
11 and did not disclose that he broke 4 pieces metal did not attempt  
12 to extract it and left it in me.  
13

14 Tungsten is toxic in humans it causes Pulmonary edema which is  
15 fatal, scar tissue on the lungs amongst other serious issues. Yet  
16 the Judges have allowed Quinn Emanuel to interfere with my medical  
17 treatment.  
18

19  
20 Amber started getting sick shortly after the surgery in 2017. I  
21 went to at least 17 highly qualified surgeons to help me. They all  
22 turned me away firstly stating that the surgery is too high risk  
23 nobody wants to be the one to amputate a limb person my age after  
24 another surgeon destroyed it. Secondly none of the surgeons want to  
25 be involved in this omnipotent litigation process. Quinn Emanuel  
26 lawyers already threaten my Harvard surgeons with defamation and  
27 hearsay for declaring medical facts.  
28

1 Quinn Emanuel illegally called my medical team in ex parti  
2 communications without my knowledge and told my medial team what  
3 they have to say in their declarations more evil witness  
4 tampering.  
5

6  
7 That same Lawyer Bruce Van Dalsem showed up on the door steps of  
8 teenage rape victims and threatened them and bribed them into  
9 signing agreements not to testify in my case.  
10

11 This is after the judge forced me to disclose the names of  
12 victims that came forward. I don't want to look at him either. And  
13 I am not going to sit in any room other than the court room with  
14 John Quinn.  
15

16  
17 Finally after an exhaustive search I found the only surgeon and  
18 team willing to attempt to save my arm and my life. He performed  
19 the first surgery a few approx 3 Months before trial in 2019. He is  
20 from Harvard.  
21

22  
23 How dare Quinn Emanuel impose their despicable ways upon my  
24 medical team. They have not done anything in error.  
25

26  
27 The discovery referee Read Ambler only gave Amber 90 days to  
28 find a qualified surgeon deal with the surgical complications

1 undergo major surgery on two bones go through chelation for the  
2 metal toxicity heal and stop taking over a dozen medications  
3 prescribed to help Amber survive.

4 The surgery was in July 2019 the trial was in October 2019.  
5 Judges and lawyers are not Surgeons they have no business  
6 interfering in plaintiff's critical medical treatment. Surgeons are  
7 telling them that I need treatment and they are violating my rights  
8 and telling me the treatment is not necessary or that I don't  
9 deserve medical treatment which ever, it is its wrong and illegal.  
10

11  
12 William Paoli also sits as a judge on the bench he is an  
13 extremely abusive man. He screamed at me in public places several  
14 times.  
15

16  
17 Shortly after Amber signed the retainer agreement he changed  
18 from being a victims advocate and a man of god to threatening to  
19 abandon my case and keep \$500,000.00 that he never earned from my  
20 attorney client trust account even though he was on a contingency  
21 due to the fact I can never afford to pay the millions of dollars  
22 per year that Michael Goguen pays his lawyers to do illegal things.  
23  
24

25 William Paoli began telling Amber repeatedly about the horrific  
26 details of how his first wife died. He then kept telling Amber  
27 about the strippers he was involved with in Chicago and that they  
28

1 were not victims of human trafficking . I doubt he knows whether  
2 they are victims of human-trafficking or not. I really did not want  
3 to hear about my lawyers perversions.  
4

5  
6 Paoli stated that he was punishing me for the strippers in  
7 Chicago taking money from him and for my not paying millions of  
8 dollars to Patricia Glaser for making a mess out of my case.  
9

10  
11 Glaser Weil tricked Amber into signed a verified complaint no  
12 lawyer ever explained to me what a verified complaint was or that  
13 there was a choice.  
14

15 I signed it in a room by myself Jill Basinger was supposed to be  
16 there when i signed it she called me to come to the office and the  
17 receptionist told me she went home with a headache. I signed the  
18 verified complaint in a room by myself. Nobody told me anything  
19 about the fact it could not be amended or anything else. I only  
20 learned all of this during litigation.  
21  
22

23  
24 Amber does not know why men in strip clubs and brothels think  
25 the girls are there because they are attracted to the customers. We  
26 are not attracted to gross perverts, they have bad hygiene are so  
27 unattractive, rude, arrogant perverted, drunk, high and they are  
28

1 all sitting in the same room rubbing their penises. That is so  
2 perverse.

3

4

5

6

7

8

If the perverts believe themselves to be famous they say  
here's my card don't tell anyone I was here. I told all of them  
this is a public place there are 2000 people in the room everyone  
can see you.

9

10

11

12

13

14

Again Amber has no explanation for why men are sexual predators.  
Someone told me recently they had to call the police because a  
guy kept coming to the school and master-bating when the girls came  
out for recess. This is unacceptable.

15

16

17

18

19

20

21

22

23

24

25

26

27

28

What is Diane Doolittle going to say? little girls need to be  
prayed upon by old men master-bating outside their schools.

I will never ever ever have a daughter there is no way to  
protect her from these psychopaths. Men can not touch children. Men  
can not look at children naked. What is wrong with this pedophilic  
culture.

Children don't have sex with each other let alone with old men.  
Let them be children. I don't understand what is attractive about a  
child. I don't understand what the purpose of rape is. Men are

1 supposed to love women not rape them and master-bate on people they  
2 don't know and put there vile hands on children.

3  
4 Amber is so sick, physically ill from hearing all of these girls  
5 and women's experiences. STOP raping people! Men have to be caste-  
6 rated as soon as the rape anyone. I don't know what other solution  
7 there is. I have been hiding for so many years but rapists find me  
8 everywhere as soon as they talk to me or follow me I escape before  
9 they touch me.  
10

11  
12 After Richard Sherman Abandoned me after violating the legal  
13 code of ethics and mis-spending from my costs account.  
14

15  
16 I was introduced to William Paoli through Rivers Morell ,Alan Brown  
17 and Brian Nash I guess.  
18

19  
20 Paoli was awful to me screaming about rape and trafficking in  
21 the middle of restaurants.  
22 Threatening me all of the time.

23 Amber was dealing with the health crisis created by the first  
24 surgeon walking around for years with broken bones and Metal  
25 poisoning and severe anemia.  
26

27 I can not even get doctors to treat me because of this  
28 litigation and the fact that i will never have insurance because of



1 all of the pre-existing conditions caused by Michael Goguen's  
2 abuse.

3  
4  
5 Amber repeatedly asked for a trial continuance  
6

7  
8  
9 Amber was threatened that if I went to trial I would be murdered.  
10 I had no lawyers.  
11

12  
13  
14 As soon as Amber could try to manage the complex PTSD, quit all  
15 of the medications while still pending two major surgeries that I  
16 can not pay for do to this illegal judgement procured by bribing  
17 Judges and violating all of Ambers human rights I Filed a motion  
18 to vacate the judgement based on extrinsic fraud upon the court and  
19 presented all of my evidence.  
20

21  
22 Judge Danny Chao Further violated Ambers rights by denying her  
23 motion to vacate the judgement or Grant Amber a new trial all he  
24 cited was that it took Amber too long to file.

25  
26 Amber had to rely on 3rd parties that Michael Goguen and Diane  
27 Doolittle lied about to provide evidence of the stalking and intent  
28 to murder Amber. When I had the evidence to prove my case I have to

1 try to get the pain and bleeding under control to be able to go to  
2 represent myself in court.

3  
4 These are extremely extenuating circumstances. Upon examination  
5 the evidence Judge Danny Chao should have immediately granted a new  
6 trial or enforced the contract.  
7

8  
9 This is an unprecedented case. Amber can find nothing similar in  
10 case law. I have to go to the law library and do hundreds of hours  
11 of research for the last 8 years.  
12

13  
14 Hon. Danny Chao the trial judge in this case who allowed the  
15 trial to go forward without Amber or any lawyers on behalf of Amber  
16 yet again been improper in denying my motion citing only that I  
17 filed to late not that based on evidence everything that I allege  
18 is true and continues to happen to todays date without any  
19 protection for myself or anyone I know.  
20

21  
22 I have no comprehension of why Hon. Danny Chao allowed a bench  
23 trial to go forward in a court Amber had never been too. And  
24 allowed Diane Doolittle to do everything that violates the court  
25 and the constitutional rights of Amber.  
26

27 Judge Chao allowed them to play a Hollywood film that has zero  
28 relevance to the case. The film was made around the time Amber was

1 born. Hollywood films based on fiction are not evidence in courts  
2 of law. I am not sure if they are even evidence if the case was  
3 about the film. I have not seen the film it is irrelevant to this  
4 case. I watch very little television.  
5

6  
7 Goguen watches war films between rounds of sodomy because he is  
8 a psychopath.  
9

10 Read Ambler's fraud upon Amber , Fraud upon The Court and  
11 perversion of the course of justice. Due to Quinn Emanuels abuse  
12 of the legal process their only tactic was to silence victims,  
13 Steal money, file thousands upon thousands of irrelevant documents,  
14 and serve irrelevant discovery month after month as a tactic to  
15 overwhelmed the court and deplete all resources Amber had, exhaust  
16 and overwhelm Amber and Ambers counsel delay the proceedings, try  
17 to give Amber a nervous break down by stalking her an threatening  
18 her life relentlessly.  
19  
20

21  
22 The psycho-therapist after review of everything explained to  
23 Amber that what they are doing is gas-lighting. Telling me rivers  
24 was stalking me everyday, Trying to convince me that I am crazy  
25 when no specialist in the medical profession detects any mental  
26 illness besides Complex- PTSD caused by trauma. Diane Doolittle  
27  
28

1 tried to convince 3rd party witnesses to allege that Amber has a  
2 plot personality disorder. Diane Doolittle has no PH.D in medicine.

3  
4 Stop gaslighting me and stop Advertising me. You did not win a  
5 law suit you violated Amber's rights committed crimes tampered with  
6 witnesss, law enforcement and judges. that is not winning a  
7 lawsuit.  
8

9  
10 After they overwhelmed the Court They assigned a \$900.00 per  
11 hour discovery referee Hon. Read Ambler who further abused the  
12 legal process. He sanctioned Amber and stated she could not testify  
13 about being a victim of human trafficking He sanctioned Amber  
14 \$17,000 USD for not being able to produce items not in her  
15 possession that have zero relevance in this case and under the laws  
16 of other countries even if she had them in her possession it is  
17 illegal to make copies or disseminate the documents in anyway which  
18 would lead to Amber being prosecuted in other nations.  
19  
20

21  
22 The refereed Did not sanction Michael Goguen even 1 penny at any  
23 time even though he did not turn over any relevant discovery and  
24 tampered with witness and did a great many illegal things before  
25 the proceedings, during and after the proceedings.. His lawyers are  
26 as guilty as the rapist is.  
27  
28

1 Read Ambler then issued Terminating Sanctions with no legal basis  
2 to do so. He was appointed to make discovery decisions not to hear  
3 motions.

4  
5 William Paoli Stated he was going to file a Writ of mandamus he  
6 did not. Paoli was too busy threatening Amber. He then stated he  
7 would still be trying the case even though he withdrew from the  
8 Cases. Amber asked him not to remain On the Rivers Morell case in  
9 Orange County as he was threatening Amber, stealing from Amber,  
10 telling Amber to amputate her Arm because he would win her case at  
11 trial and she could then buy a platinum arm.  
12  
13

14  
15 Even though William Paoli had a contingency and was holding  
16 500,000 USD in the attorney client trust I believe. He then said  
17 Amber had to pay separate fees for the writ of mandamus.  
18  
19

20 William Paoli then secretly went to meet Michael Goguen and  
21 Diane Doolittle in Las Vegas. Amber had no knowledge of this until  
22 long after.

23 Amber does not know what transpired at the meeting or how much  
24 money they Gave William Paoli to destroy Amber's trial and to  
25 destroy critical evidence in the case. Amber Does not know how many  
26 People met in Las Vegas or what was discussed or how they further  
27 exploited Amber at this meeting. Amber has no idea why these  
28

1 perverts were meeting in Las Vegas none of us live in Las Vegas.  
2 Goguen has more lawyers in Las Vegas.  
3

4 When William Paoli failed to prepare and file the writ of  
5 mandamus and abandon Ambers case Goguens lawyers filed another  
6 motion for terminating sanctions which should have been heard by  
7 the trial Judge not Read Ambler but he colluded once again with  
8 Quinn Emanuel to violate Ambers rights and heard the motion and  
9 granted their motion while I was in pro per receiving from surgery  
10 with two broken bones, metal toxicity, seizures and taking so many  
11 prescription medications to stop my body and mind from shutting  
12 down.  
13  
14

15  
16 I then went to the court in San Mateo even though I was never a  
17 resident of San Mateo other than Micheal Goguen keeping me at the  
18 Rose Wood Sand Hill for the purposes of sexual exploitation.  
19  
20

21 Goguen and his lawyers chose the Jurisdiction for if He  
22 breached the contract. As soon as Goguen was fired from Sequoia  
23 capital he promptly moved to Montana never came to a sing motion  
24 hearing and forced everyone o travel to his location.  
25

26  
27 At no point Did Goguen or any of his lawyers inform Amber of  
28 what a statute of limitations was. They conspired together to

1 violate Ambers legal rights to have a trial by jury from the very  
2 beginning.

3

4

5

6

7

8

9

Rape and trafficking victims don't know anything about statutes  
MSJ's, Sanctions, lawyers or otherwise. I have never heard of any  
of this until the lawsuit was filed. I have no idea why Patricia  
Glaser did not tell me what to expect during litigation. I will ask  
her at her deposition.

10

11

12

13

All 58 lawyers their spouses are defendants and witnesses many of  
them are married to Judges and lawyers.

14

15

16

17

18

19

20

21

Had these criminals not hired all of these men to stalk Amber

22

23

24

25

26

27

28

I would not have shattered my arm. I then sat through a  
deposition with my arm hanging off my body the day that it broke. I  
was then left for 5 days waiting for surgery because the surgeons  
were on summer vacation.

The first surgeon failed at his job. He used toxic drill bits  
and left them in my bone marrow. Did not disclose it to me or any  
other doctor, stated my bone is healed after approximately 8 weeks.  
Sent me to Physical therapy. I was there pushing myself 5 days a  
week while being stalked.

1  
2 People are calling me daily asking why are these creeps at my  
3 house Who is this psycho and where on earth did you meet a psycho  
4 like this and why was this all a secret? I don't know what  
5 everyone thought I was supposed to say to anyone about all of this.  
6 I did what i thought was best to keep everyone else safe and try to  
7 recover from this trauma. I am not the type of person who talks  
8 about the trauma. That is pointless it contributes to the PTSD.

10  
11 All I can do is apologize to these people for what Quinn  
12 Emanuel have done and they are violating innocent peoples privacy  
13 making them live in fear and causing distress to people that  
14 literally don't know anything about any of this. They weren't  
15 there, they didn't have any information. I had to walk past  
16 investigators to go see my grandfather on his death bed.  
17 I was diagnoses with PTSD at age 19. I had never heard of it  
18 before. i went to the hospital because I thought I was having a  
19 heart attack. The doctor explained this was an anxiety attack. i  
20 said old people have anxiety. I am too young. He said it can happen  
21 anytime. He asked so many questions not leading questions merely  
22 questions I could not answer without telling him about the gang.



1 Chris Reynolds is the worst stalker. He needs to be charges  
2 with stalking trespassing hacking and what ever else he is guilty  
3 of. What a pervert.

4  
5 Why do you think you have the right to terrorize me?  
6  
7

8 People outside of America have only seen private investigators  
9 on television. Why ?because in other countries it is illegal to use  
10 a private investigator to go to someone's home. It is under the law  
11 stalking by alternative means.  
12  
13

14 These investigators after all of their harassment came up with  
15 nothing but a psychotic strip club owner and a mentally ill, insane  
16 drugged out 50 something year old dominatrix who has multiple  
17 personality disorders. She comes with zero evidence and zero  
18 credibility. She dumped her older daughter in the strip club and  
19 brought a 4 year old daughter to swingers parties and let her new  
20 husband molest the child. All children are removed from their care  
21 except 1.  
22  
23

24 I am very upset about what she did to the children who I love  
25 very much. I promised to be their God mother because she was an  
26 only child and a very crazy drug addict. I had already stopped  
27 talking to her long before the rapist send investigators went to  
28

1 her house to bribe her into lying in this deposition where I had no  
2 lawyers to ask her questions.

3  
4 At least the judges in the Children's cases removed them from the  
5 custody of these child abusers.

6  
7  
8 If you want the information about the traffickers go ask the Gang.

9  
10 I was literally vomiting in the restroom at  
11 physiotherapy because the pain is so intense. I then Go to another  
12 surgeon and the intern tells me don't you think the pain has  
13 something to do with the broken metal in your bone. I said I think  
14 you have the wrong patient. He says no it's right here on your x-  
15 ray.  
16

17  
18 After Shattering My arm. Upon arrival in 2018  
19 Amber arrived in LA and was sent for X-rays and was told the bone  
20 never healed and is completely shattered that I never should have  
21 been sent to physical therapy. I then learned the metals are toxic  
22 and causing me more health problems. I have no way to obtain health  
23 insurance because of all the pre-existing conditions caused by  
24 rapist Mike Goguen.  
25  
26  
27  
28

1 Amber then attended appointments to at least 17 different  
2 surgeons to learn that the damage done by the first surgeon is  
3 beyond the scope of capabilities possessed by the some of the very  
4 best surgeons in the country. I found only one team of surgeons  
5 capable and willing to try to fix the arm.  
6

7  
8 Bruce Van Dalsem from Quinn Emanuel subsequently broke the law  
9 and violates all of my rights and calls my medical team and  
10 threatens them with defamation hearsay and everything else causing  
11 me further damage.  
12

13  
14 All of this while dealing with never ending harassing discovery  
15 being deposed over 50 hours. Going to my lawyers offices, being  
16 homeless, going to hearings.  
17

18 All the While Goguen is out preying on more unknowing Girls and  
19 women. He never came to a single discovery or motion hearing. All  
20 he did was lie under oath, destroy evidence and hire men to stalk  
21 and kill Amber.  
22

23  
24 Quinn Emanuel will not even give me the transcripts from the  
25 depositions so I can enter it into evidence.  
26  
27  
28

1 Goguen told Amber if she did not sign his agreement and went to  
2 trial he would get a "dirty Judge". Amber did not know what that  
3 meant. I thought judges had to uphold the law. I did not have any  
4 awareness of this level of corruption and conspiracy.

5 Prior to this litigation Amber thought only traffickers murderers  
6 pedophiles and rapists were bad people she had no idea Lawyers and  
7 Judges were corrupt.  
8

9  
10 When this trial took place.

11 Amber had Just had surgery, I was taking 14 prescribed medications  
12 daily to stop my body from shutting down. I went to the court in  
13 San Mateo Ex-Parte Shortly Before the trial in 2019 with evidence  
14 and declarations from my medical team. After Asking Quinn Emanuel  
15 to continue the trial date until I was able to participate. Quinn  
16 Emanuel said They would not continue the trial. Even though the  
17 trial was continued for things so mundane as Doolittle forgot it  
18 was spring break yet Goguen has 50 plus other qualified attorneys  
19 on the case. I do not know how many law firms and lawyers he has in  
20 total all I know is every time I look at a document there it seems  
21 another lawyers name is on it.  
22  
23

24  
25 I am my own lawyer because of everything that has happened, the  
26 rapist and his lawyers chose the jurisdiction of the court. San  
27 Mateo is not a jurisdiction I ever lived in. Except for the hotel  
28

1 The rapist kept his victims in and that other rapists keep their  
2 victims in. I filed the lawsuit and the rapist moved out of the  
3 state of California.

4  
5 When I went to the court with my motion to continue the trial for  
6 very good reason. I had to take medications. I was not clear in my  
7 mind to try a case. I just had major surgery and my bones were not  
8 healed at all. I was having seizures. I have panic attacks I have  
9 Complex PTSD, I have a parasomnia caused by all of this trauma.

10  
11  
12 Amber can never sleep. When I do sleep I have night terrors which  
13 is something different than night mares. I re-live the sexual abuse  
14 and the beatings and everything else in my sleep. I am scared to  
15 sleep. It gets worse all of the time. I don't think I should be  
16 trying this cases on my own. I have collapsed on the floor.

17  
18 I don't know what will happen in the court.

19  
20  
21 What choice do I have? This isn't as simple as a dog bite.

22  
23 I Went to the San Mateo court. I filed my motion to continue the  
24 trial with my evidence that I was in no condition to try the case.  
25 I could not possibly try the case alone without a lawyer. I had to  
26 take the medications until the doctors said it's okay to  
27 discontinue. I still had broken bones at the time of the trial.

1  
2 My lawyer William Paoli destroyed evidence, stole money and did  
3 the most egregious things that any lawyer could do to their client.  
4 He then tells me he is going to sue me for defamation if I tell  
5 anybody he stole from my trust account  
6

7  
8 William Paoli said he was going to step in and try the case at  
9 the time of the trial even though he withdrew from the case so he  
10 could take the money in the try client trust account. That is all  
11 in evidence.  
12

13  
14 Amber does not know at what Point William Paoli began conspiring  
15 with Goguen and His lawyers.  
16

17 Paoli told Amber to report Richard Sherman to the state bar the  
18 state bar then called Paoli and Paoli lied to the state bar.  
19  
20

21 When I gave my evidence and Filed my motion to continue the  
22 trial based on my medical conditions as of October 2019 the judge  
23 denied my motion to continue the trial. That was improper of the  
24 judge. The Judge knows I can not be my own lawyer and try the case  
25 with broken bones and a long list of debilitating medical  
26 conditions caused by Goguen and medications in my body impeding my  
27 ability to think. That is not allowed in a court of law.  
28

1  
2 This brings us to this improper use of defamation.  
3 Look up defamation. You people just use these terms so loosely and  
4 try to apply them illegally. I have to live on this planet too and  
5 all of you have made that impossible.  
6

7  
8 You fail at your duty. Lawyers have a duty of care. Surgeons  
9 have a duty of care. Judges have a duty of care. These lawyers and  
10 Judges have abdicated their duty to myself and society. They have  
11 violated the very justice system in which they serve and are bound  
12 by the law. They have a duty to do no harm.  
13

14  
15 The lawyers and Judges have abdicated their duties as officers of  
16 the court for which they took oaths to uphold the laws of the land.  
17 As well as an oath to do no harm.  
18

19  
20 They can represent rapists however they can not victimize the  
21 plaintiff.  
22

23 Amber has asked all of them 100s of times to stop exploiting  
24 Amber and to stop advertising amber and to stop dragging her  
25 infant of the gang and every other trafficker on this planet.  
26  
27  
28

1 I don't have a polluted mind like all of you. Everything you  
2 have done is so wrong. It's not fair and inhumane. You have turned  
3 my human existence into currency.

4  
5 Even after all of the horrible things. The rapist has done to me I  
6 then still went to two mediations that Diane Doolittle pleaded for.

7  
8  
9 Even after that I agreed to the mediator's proposal. Diane  
10 Doolittle of Quinn Emanuel called me and told me there was nothing  
11 Rivers Morell could sue Goguen for.

12  
13  
14 Amber is not a lawyer. You people have 1000s of years of  
15 combined legal experience. This is a gang of lawyers now  
16 trafficking Amber. I never agreed to lawyers and judges living off  
17 of the avails of Ambers sexual exploitation and slavery for 9  
18 years.

19  
20  
21 I submitted my motion for reconsideration which was valid. The  
22 referee Read Ambler Defrauded Amber by not reviewing Amber's Motion  
23 for reconsideration because the declarations of the experts were  
24 not on filing paper there is no requirement for experts who type  
25 their own declarations to be typed on filing paper. They submit  
26 their declarations that way all the time. Surgeons are not lawyers  
27 they do not have filing paper.



1  
2 All of this misconduct is reprehensible. What else does anyone  
3 expect from Lawyers who choose to profit from the trafficking and  
4 rape perpetrated by a serial rapist.

5 The violate everyones rights for their profit.  
6  
7

8 Victims have rights the court is not merely for the rich and the  
9 guilty and their armies of lawyers I would like to know why any  
10 innocent man needs 58 lawyers to defend him in a breach of contract  
11 for the contract that they wrote.  
12  
13

14 Yet Amber is forced to represent herself so that she can try to  
15 save her life. Due to the fact that Quinn Emanuel tampers with  
16 every lawyer she has retained Amber no longer trusts lawyers does  
17 not want to be victimized by her won lawyers again and nobody wants  
18 to deal with an unscrupulous criminal like Diane Doolittle I called  
19 literally hundreds of lawyers. They all think she is unethical.  
20  
21

22 The Judiciary unfairly lets the lawyers withdraw from my case  
23 knowing I am not a lawyer that i have paid copious amounts of money  
24 to they and they have not done their jobs nor upheld their  
25 fiduciary duty to Amber.  
26  
27  
28

1 Every lawyer that Amber is not suing that stole or violated my  
2 rights should be commended by the courts to provide free legal  
3 services to the child victims of sex trafficking that I present  
4 them with for the reader of their ability to practice law.  
5

6  
7 Victims have the right of the court. It is a branch of the  
8 government the Judges do not work for the perpetrator of the  
9 suffering imposed upon plaintiffs.  
10

11 Diane Doolittle's attempt to manipulate the justice system and  
12 success at it thus far her attempt to diagnosis severe medical  
13 maladies is despicable ,psychotic outrageous egregious and  
14 malicious. She alleges nothing is wrong with me. I am extremely  
15 anemic because of the ongoing blood loss since the England rape the  
16 blood loss from the arm shattering the surgeries and my body will  
17 no longer absorb Iron which renders me almost no immune system. And  
18 she alleges  
19  
20

21 I have no right to a trial  
22 I have no right to a home  
23 I no right to a bank account  
24 I have no right to work  
25 I have no right to safety  
26 I have no right to peace  
27  
28 I have no right no to be stalked

1 I have no right not to be Murdered

2 I have no right to not to be trafficked

3 I have no right to surgery

4 I have no right to food

5 I have no right to report to law enforcement

6 I have no right to speak the truth.

7 I guess I have no right to life.

8 But all of these people have the right to exploit me and live off  
9 of the avails of my sex trafficking

10 A hysterectomy at a young age has consequences and risks

11 Depression

12 Early dementia

13 Incontinence

14 Mood swings

15 Heart disease

16 Bowel dysfunction

17 Fistulas

18 Hot flashes

19 Bone loss

20 Anxiety

21 Insomnia

22 Pelvic prolapse

23 Vaginal dryness

Amber was in Good health besides the complex PTSD prior to Goguen intentionally infecting her with High risk HPV and mutilating Amber's body causing the hemorrhaging

Diane Doolittle is not a medical doctor of any sort and she should not be practicing law she is cruel a criminal and inhumane She is a female misogynist She is a horrible Juris Doctor.

The risks of Cervical cancer, anal cancer, vaginal cancer, throat cancer related to HPV are self explanatory.

Diane Doolittle and Goguen believe Ambers body should be treated with sub par medical treatment in a public hospital cut apart and when Amber is dead just discard her body.

Any judge in any civilized country participated in this conspiracy must step down and very practice law again. The people of this country and beyond all have rights equal rights

I will deal with the Canadian Judiciary and legal mis-conduct severally the International mis-conduct as well. Under the laws of those countries

1 Everything Quinn Emanuel has done goes beyond mis-conduct and is  
2 illegal

3  
4 There are countries like that on this planet, America is not  
5 communist this is not a dictatorship. Is that how everyone wants  
6 this country to be? Zero freedoms or Civil liberties? A judge can  
7 just be bribed and you lose your right of free speech you lose the  
8 right to speak and give evidence in a court of law you lose the  
9 right of self protection and the right to seek help of law  
10 enforcement. A person no longer has a right to trial by jury?  
11  
12

13  
14 That is not what the Constitution States.

15  
16 There is no statute of limitations on fraud upon the court. It  
17 is at the discretion of the judge when the evidence was presented  
18 Hon. Danny Chao was bribed and tampered with by Goguen and Quinn  
19 Emanuel.  
20

21  
22 Danny Chao then granted their motion to seal all of the evidence of  
23 my abuse and presiding Judge Hon Elizabeth Lee signed an illegal  
24 restraining order that prevents me from providing evidence in a  
25 court of law in any of these cases. For the last 9 years of this  
26 litigation Amber has yet to testify in a criminal court or civil  
27  
28

1 court in any country. No evidence has been presented to Judge or  
2 Jury.

3  
4 That is a violation of the US constitution and all of my rights  
5 and a crime against society. There are courts and law enforcement  
6 Jails and sex offenders lists to protect society.  
7

8  
9 The public has the right to know who the criminals are who walk  
10 amongst us.

11  
12 There are no special rules for these criminals nor is there a  
13 secret court. All people have a right to trial by jury.  
14

15  
16 Yet again Diane Doolittle violated Ambers rights and perverted  
17 the course of justice by sending me pleadings that the hearing was  
18 at 1 pm March 1, 2023 yet it was at 9 am March 1 2023.

19  
20 None of the lawyers have ever once met and conferred with my in  
21 The San Mateo case or the Orange County case where I am the  
22 defendant in a \$100,000,000.00 lawsuit where Rivers Morell Is suing  
23 Amber, Michael Goguen and Quinn Emanuel and Goodwin Procter for  
24 forcing me to fire Rivers Morell They refuse to give me the  
25 pleading and the discovery they stipulate to things and don't tell  
26 me. They have hearings and do not give me the notices or the minute  
27 orders. They take depositions and deny me my right of cross  
28

1 examination. They do not give me the transcript and tell me I have  
2 to pay \$2500.00 for copies of the transcripts. I don't know who has  
3 the transcripts as I was denied any participation in the  
4 depositions.

5  
6  
7 Amber can not download the pleadings from The Orange county  
8 court website as I am not a flowerier and I no longer have any  
9 money nor do I have credit cards to pay for the pleadings.

10  
11 Somehow after paying the debt for my indentured servitude 17  
12 years ago I am now in debt bondage by the judges illegal order  
13 Quinn Emanuel and Goguen own my life I have to pay them 7 million  
14 more dollars for being raped trafficked and contracting these  
15 despicable STDS from Goguens malice. I can't take enough showers I  
16 can't scrub Goguen off of me I can't even clean him of with  
17 peroxide and rubbing alcohol. Goguen and all of his prostitutes  
18 germs are inside of my body forever until I die.

19  
20  
21  
22 All of these lawyers and Judges must immediately be disqualified  
23 from all cases involving Amber.

24  
25 The lawyers refuse all of Ambers requests for service of  
26 motions discovery and pleadings  
27  
28

1 They do not meet and confer with me there have never answered the  
2 phone they use hacking equipment to trace my wear about's the have  
3 tried multiple time to get me alone for examinations and to bring  
4 "discovery " by my myself to Quinn Emanuel offices while Michael  
5 Goguen has solicited my murder he has two companied that  
6 manufacture weapons of mass destruction.  
7

8  
9 He has now had the chief of police Bill Dial step down because  
10 he fired the detectives who were responsible for investigation the  
11 rapes of his minor victims in Montana and Michael Goguen bribed the  
12 detectives who now work for Goguens sex enterprise. The government  
13 does not work for Michael Goguen.  
14

15  
16 Bill Dial served the community for 30 years prior to that he  
17 was a teacher in public schools. He is more than 70 years old give  
18 him back his credentials all of the problems were created by Goguen  
19 interfering in police business and bribing the detectives who were  
20 there to investigate crimes against rape victim's and murders of  
21 young women in the harem.  
22

23  
24 He paid to get Eric Grieten's in to office as Governor of  
25 Missouri that man is another sex offender and had to step down from  
26 office for being a pervert. Michael Goguen thought Eric would  
27  
28



1 appoint Michael Goguen to secretary of defense if Eric became  
2 president.

3

4 Goguen Believes he is a super hero in the likes of batman, he  
5 is mentally deranged.

6

7

8 Amber is a victim of Human trafficking so Goguen tried to  
9 manipulate the narrative by paying one million dollars to a very  
10 dishonorable charity called deliver fund they can not accept  
11 donations to combat human trafficking from a rapist and human  
12 trafficker that is not how the world works.

13

14

15 Michael Goguen then decided oh, I made Amber homeless so let me  
16 clean up my image by dumping slop on homeless peoples plates for a  
17 photo opportunity. Goguen is a psychopath to say the very least.

18

19

20 That is actually an insult too psychopaths.

21

22 Michael Goguen is in possession of an fake Sheriffs badge with  
23 is a felony

24

25

26 Michael Goguen is in possession of drugs he uses to render  
27 victims unconscious so he can rape them.

28

1 Michael Goguen is in possession of illegal hacking equipment.

2

3 Michael Goguen is in illegal possession of a sting ray on his  
4 helicopter that steals thousands of peoples electronic data and  
5 listens in on phone calls including those of law enforcement.  
6

7

8 Michael Goguen is in possession of thousands of weapons of mass  
9 destruction. Michael Goguen his lawyers and agents are in  
10 possession of child pornography taken of Amber.  
11

12  
13 Goguen is illegally tampering with multiple government agencies  
14 and paying for independent CIA missions this is all highly illegal  
15 and then he has everyone he victimized or worked as his agents put  
16 in jail.

17

18  
19 Michael Goguen and Quinn Emanuel then bribed reporters to state  
20 publicly that Amber is racist.

21

22 Amber has no idea why they think are lying and saying amber is  
23 racist I have very mixed heritage and I am every race on this  
24 planet. I do not know why Diane Doolittle insist on telling me what  
25 race I am. I guess she exerts the American Idea of the one drop  
26 rule changes your ethnicity. What are they alleging i am racist  
27 against myself? They are diabolical.  
28

1  
2 Even if I were only one race that does not equate to me being  
3 less or more of a human. I am shocked that lawyers said I can't be  
4 of a certain ethnicity or I will be prejudiced and I can not have a  
5 religion or I will be prejudiced in court.  
6

7  
8 The essence of what the lawyers purported is that the court the  
9 judge and society are only for people of Purely caucasian Anglo-  
10 saxon American's. This Ideology was always improper and it has no  
11 place in a civilized society or anywhere on this planet.  
12

13  
14 Prior to this litigation I believed only Rapists, Murders and  
15 people in strip clubs the customers and the traffickers were evil  
16 people. Thanks to Diane Doolittle's misconduct and illegal  
17 activity I know there a great many evil doers on earth not just  
18 traffickers rapists and pedophiles and murders.  
19

20  
21 Amber has every type of friend I serve girls any women no matter  
22 where they are from. i do not discriminate. So that is truly  
23 defamation and malicious protection he his that after he paid the  
24 NBC reporter to make a face news story about Michael Goguen being  
25 Batman and saving lives and in the news story they violated my  
26 copyright by publishing photos that I am the sole copy right owner  
27 of and Michael Goguen agreed to destroy all images of me upon the  
28

1 signing of the agreement he and his lawyers and agents are in  
2 possession of child pornography taken of Amber as a minor.

3  
4 This reporter was fired from NBC for this fake news report.

5  
6  
7 Goguen and his agents refuse to destroy the child pornography and  
8 continue to damage me by purchasing it illegally by bribing  
9 photographers that I had no idea had the images in their possession  
10 decades later.

11  
12  
13 Amber has asked them to stop looking at it and disseminating it  
14 but to no avail they just keep violating me.

15  
16 The Judges and Court in San Mateo forced Amber to be a whistle  
17 blower now Amber is a Narc and a rat and will be killed by the  
18 organized crime Syndicate they have already found me and threatened  
19 me.  
20

21  
22 We went through brain washing about being a rat to the pigs and  
23 the 5/0. That's the police. Brain washing began day one of  
24 trafficking.  
25

26  
27 Amber is very scared they will murder me and the people I love.  
28 They would likely order the people I love to keep me silent.

Ambers brothers father was found dead the first time the investigators illegally came stalking and hunting for me and everyone else in Canada.

Since then the Gang found Amber and surrounded the building I was in for 9 days I have encountered them on multiple occasions after not seeing them for a decade.

If Amber dies because of anything Michael Goguen and his lawyers and agents have done they should be charged with my murder. This includes death related to HPV ,Death related to them interfering in my ability to obtain medical treatment, If I am murdered by the traffickers or any of Michael Goguen's agents lawyers, henchmen or otherwise inclusive of Amber being murdered by the Gang because the Judge did not care what would happen if Amber was forced to name an international organized crime syndicate publicly.

Murder includes if I die by anemia , Metal toxicity complications, or any vaginal, anal hemorrhaging or basically any other cause of death because I have no means to pay for medical treatment. As long as I live I can never obtain Medical insurance as I have many preexisting conditions stemming from Michael

1 Goguen's Abuse. Doctor assisted suicide to prevent a violent murder  
2 should also be considered murder. My life as been stolen from me  
3 time and again.

4 This is all of their illegal activity and my blood is on Goguen  
5 and the Judiciary's Sequoia's and Quinn Emanuel's hands.  
6

7  
8 They have dehumanized Amber yet again. If I have to suffer Or  
9 with be trafficked again i will have a doctor assisted suicide in  
10 Canada. I am not a suicidal depressive but if it is the only way  
11 not to be trafficked or raped I will request the doctors assistance  
12 in committing suicide.  
13

14  
15 The possession of the child pornography is not only damaging me  
16 it is damaging the other girls in the photos. The original  
17 trafficker not only trafficked me. He began trafficking girls and  
18 women in the 1970s.  
19

20  
21 Two step sisters were also trafficked. I have not seen them since  
22 about 1999 the third time I was sent to Asia. I never seen them  
23 again when I came back perhaps they are dead I do not know. I asked  
24 about them at the photo studios nobody would say anything. I Seen  
25 their photos there that I had not seen before. Maybe they were also  
26 murdered and feed to pigs on the pig farm in Vancouver. I knew some  
27 of those girls. Not well but I knew some.  
28

Amber did not have a passport nor a work visa when she was illegally trafficked to foreign countries.

Michael Goguen and Quinn Emanuel removed the attachments from emails with photos.

Michael Goguen the rapist sex trafficker and pedophile controlled the email accounts and my passwords.

Goguen locked Amber out of the accounts and destroyed all of the emails that incriminated him. He deleted the accounts in entirety. He produced only what suited his agenda of perverting the course of justice and defrauding the court and society.

I do not think all of the photos were of me. We shared photos customers did not care what images we sold them just as long as they had something to look at. I was the youngest. We shared images we look similar in photos with make-up we shared fake IDs that traffickers gave us.

We were not human beings on paper. Therefore by disseminating the images they are violating the rights of those who can not defend themselves. If they are alive they can Sue Michael Goguen And Quinn Emanuel as well. I can not see the

1 images that Michael Goguen refused to turn over he said he needs to  
2 keep them in his personal archive. I need to look at the photos to  
3 see which ones are truly of Amber. I have not seen the images in  
4 over a decade and a half.

5  
6  
7 Every time these perverts look at the child pornography they  
8 damage me more. Goguen promised to destroy all images that he  
9 manipulated Amber into giving he by saying she owed him the photos  
10 it was part of her job to give them to Michael Goguen. These images  
11 of Amber in 2014. Yet there are dozens of pervert's still looking  
12 at the images and disseminating them because of Diane Doolittle's  
13 indiscretion and her willingness to make Amber die. .

14  
15  
16 Michael Goguen and the ring leader of his lawyers Diane  
17 Doolittle share the same mental illness. Their debauchery is so  
18 profoundly outrageous its unfathomable. First the fraudulently  
19 induced me into signing away all of my rights and extinguishing  
20 them forever under the personal injury settlement agreement Goguen  
21 then raped me again and breached the agreement everyday to Sunday.  
22 While dialed Doolittle set up Rivers Morell and set me up as an  
23 extortionist. They first silenced me through the agreement violated  
24 the agreement stalked me relentlessly solicited my murder and had a  
25 judge sign an illegal order to remove my right to even present  
26 facts in a court of law. That is illegal and unconstitutional. All  
27  
28



1 victims of all crimes have rights of the criminal and civil courts  
2 and due process. the courts are a branch of the government the  
3 judges are elected by the people they do not work for Goguen and  
4 Quinn Emanuel.  
5  
6  
7

8 I pray that the court with answer my prayer of freedom from  
9 all forms of abuse. I need immediate medical treatment which has  
10 been delayed for years because of Quinn Emanuels interference in my  
11 medical care.  
12  
13

14 Michael Goguen owes Amber 40 million dollars plus compound  
15 interest plus attorneys fee's plus special damages, treble damages,  
16 compensatory damages, punitive damages and every other damage the  
17 Supreme court deems appropriate.  
18  
19

20 Rapists should be forbidden by law to force any victim into a non-  
21 disclosure agreement the public has the right to know who the  
22 rapists, traffickers and murderers are.  
23

24 The San Mateo Court has ratified Goguen's criminal activity and his  
25 pattern of behavior.  
26  
27  
28

Quinn Emanuel Owes Amber 40 million dollars plus compound interest plus attorneys fess plus special damages treble damages compensatory damages punitive damages and every other damage the supreme court deems appropriate

Sequoia Capital owes Amber 40 million dollars plus compound interest plus attorneys fess plus special damages treble damages compensatory damages punitive damages and every other damage the supreme court deems appropriate

Two bear Capital owes Amber 40 million dollars plus compound interest plus attorneys fess plus special damages treble damages compensatory damages punitive damages and every other damage the supreme court deems appropriate

All other defendants that participated in Ambers human trafficking and exploitation owe Every Girl counts a combined 1 trillion dollars before I die so that i can end human trafficking world wide. We are all equal murder is a crime rape is a crime exploiting children is a crime spreading disease id biological warfare and slavery is a crime.

In service of a better humanity Amber and Every Girl Counts a Charitable organization

Plaintiff, Amber (“Plaintiff”) for their complaint against Defendants, For Counts 1-235 ,  
alleges: HUMAN TRAFFICKING, CONSPIRACY, BAD FAITH, QUI TAM, PREMISES  
LIABILITY , NEGLIGENCE, RACKETEERING and all 235 listed caused of action  
Against all parties All of you know exactly what you are Guilty of

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over the subject matter of this action pursuant to the  
Federal Tort Claims Act (June 25, 1946, ch. 646, Title IV, 60 Stat. 812, "28 U.S.C. Pt.VI Ch.171"  
and 28 U.S.C. § 1346(b) ("FTCA").

2. This Court has personal jurisdiction over all the Defendants by virtue of their  
transacting, doing, and soliciting business in this District, and because a substantial part of the  
relevant events occurred in this District.

Plaintiff, Amber Doe (“Plaintiff”) for their complaint against Defendants,  
Michael Lewis Goguen, Sequoia Capital, Two Bear Capital, Two Bear Air, Two Bear Ranch, Proof  
research, Michael L. Goguen Trust, Valley Oaks LLC, Diane Doolittle, Quinn Emanuel And all  
defendants named and named , alleges:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over the subject matter of this action pursuant to the  
Federal Tort Claims Act (June 25, 1946, ch. 646, Title IV, 60 Stat. 812, "28 U.S.C. Pt.VI Ch.171"  
and 28 U.S.C. § 1346(b) ("FTCA").

2. This Court has personal jurisdiction over all the Defendants by virtue of their  
transacting, doing, and soliciting business in this District, and because a substantial part of the  
relevant events occurred in this District.

**THE PARTIES**

3. Plaintiff \_Amber\_ is an individual residing in the City of Los Angeles, County of Los Angeles, State of California. She has not abode as Goguen, his lawyers agents, associates and the Judges Unlawfully forced Amber into homeless and they have no remorse for their malicious and evil conduct.

5. On information and belief, Michael Goguen Resides in Montana California Nevada, Delaware, Florida , Massachusetts, Wyoming, New Mexico, Texas, New York, Washington DC Washington State and Multiple states And internationally. , (“Sequoia Capital, Two Bear Capital, Two Bear Ranch, Quinn Emanuel ,Rosewood Hotels doing business under the name of Sequoia Capital, Two Bear Capital, Two Bear Ranch, Rosewood Hotels, Quinn Emanuel LLP in the City of Whitefish, Menlo Park, Redwood City, County of San Mateo, Los Angeles, Whitefish, New York, Washington DC, San Francisco, State of California, Montana, Delaware, New York, Washington, Wyoming Delaware Texas Florida Nevada. Defendant does business as a A Human Trafficker, Venture Capitalist, Bar Owners, Venture Capital Firm, Hotel, Bar, Studio, Law Practice, Media, News, Banking, Internet, Oil and Gas, Manufactures, Modes of transportation, The Government et cetera.

6. On information and belief, defendants Are individuals corporations and Governments, a ProfessionalCorporation, (“Sequoia Capital, Two Bear, Capital Two Bear Ranch, Rosewood Sand Hill”) is a Corporation duly organized and existing under the laws of the States of California Montana, Washington, Oregon ,Florida,Wyoming, New York, Delaware,Nevada,Texas,Massachusetts and International Laws, with its principal place of business located in the Cities of Whitefish, Los Angeles, New York, Boston, Dallas, Richardson, Naples, Miami, Menlo Park, Atherton, San Jose, Redwood City San Francisco Las Vegas Henderson , Counties of San Mateo, San Francisco, Los Angeles, New York, Flathead, Orange, State of California, Montana, Washington, Oregon , Florida, Wyoming, New York, Delaware, Nevada, Texas, Massachusetts. Defendants are Individuals and Businesses and governments. Plaintiff further alleges that defendant Sequoia Capital Two bear Capital Rosewood Hotels Quinn Emanuel are owned by defendants.

7. The true names and capacities, whether individual, corporate, or otherwise, of the Defendants sued as Does 1 through 10,000,000 are unknown to Plaintiff, who, therefore, sues them by such fictitious names. At such time as their true names and capacities have been ascertained, Plaintiff will seek leave of Court to amend this Complaint accordingly. On information and belief,

Plaintiff alleges that each of Does 1 through 100 was the agent, representative, or employee of each of the other Defendants and was acting at all times within the scope of his/her agency or representative capacity, with the knowledge and consent of the other Defendants, and that each of Does 1 through 100 are liable to Plaintiff in connection with one or more of the claims sued upon here and are responsible in some manner for the wrongful acts and conduct alleged here.

### EXHAUSTION OF REMEDIES

**Amber has had EVERY human right Violated by defendants, law enforcement and the Judiciary**

**Request for case to be removed directly to the Supreme Court of the United States so defendants can not pervert the course of justice, Bribe Judges and law enforcement and they can not murder Amber.**

**Michael L Goguen Is a serial sexual predator Serial rapist pedophile Stalker and SEX TRAFFICKER who exploited his wealth and power to fraudulently and forcefully entice young women and teenage girls into engaging in abusive commercial sex acts. Through his recruiters the gang and others he did this by using Sequoia Capital ,Stanford ,Google and Yahoo as references to make Amber feel safe being in his care, Michael L Goguen persuaded financially vulnerable, Amber under the control Of international organized Crime Syndicate that she would be safe with him and that he would help her to escape and go to university only to become the most profound abuser and more explosive than the gang.**

**Amber repeated told Goguen that She was not a prostitute and that she did not want to have sex and that this situation was not her fault and he just drugged and rapped her. payments. Unbeknownst to Plaintiff Goguen was violating women and girls globally. Goguen employed the term mistress to fraudulently lure Plaintiff into his Sex Trafficking Enterprise to sexually Violate Amber Against her will and Beginning forcing an unsuspecting Amber to watch him masturbate. Forcing her to watch pornography then forcing himself on her on an air mattress.**

**These purported "opportunities" to earn money, marketed through the Gang and Michael Lewis Goguen permanently damaged Plaintiffs' life Health, Mind and Career.**

**The trauma and pain he caused Amber will remain until the date of her death.**

No amount of money can restore Amber to her original condition. He and his agents have zero remorse and continue to violate Amber in every malicious way possible. There is zero way to elucidate or comprehend what has happened and continues to happen, the infliction of suffering is profound and diabolical.

#### PRAYER FOR RELIEF

THEREFORE, Plaintiff prays for judgment against ALL Defendants and each of them as follows:

**FIRST CLAIM FOR RELIEF: HUMAN TRAFFICKING •** The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act (sex trafficking),<sup>11</sup> in which a commercial sex act<sup>12</sup> is induced by force, fraud, or coercion,<sup>13</sup> or in which the person induced to perform such act has not attained 18 years of age.

Making false or misleading statements to induce a victim to become involved in prostitution or to remain in prostitution.

Taking or keeping a victim's passport or identity papers.

Keeping a victim in debt bondage.

Using force or threats against either a victim or someone else if the purpose is to make a victim engage in prostitution. Included in this provision are various forms of coercion, such as physical violence, damage to property, and the exposure of secrets that might subject a victim to humiliation or contempt.

Providing drugs for the purpose of impairing a victim's judgment.

The Universal Declaration of Human Rights lays the theoretical groundwork for international law on human trafficking. It states that all human beings are born free and with inherent and inalienable rights<sup>1</sup> without distinction of sex<sup>2</sup> and that "[e]veryone has the right to life, liberty, and security of person."<sup>3</sup> Specifically addressing trafficking, it says that "No one shall be held

1 in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.”<sup>4</sup>  
2 While the Declaration of Human Rights has great moral weight, in itself it is not binding on  
3 governments. However, a number of international legal instruments require signatory states to  
4 combat human trafficking both within their countries and across international borders.  
5 The roots of the modern day anti-trafficking campaign reach back over a hundred years to two  
6 separate but related movements: the effort to eliminate slavery, often understood in terms of  
7 race-based or ethnically-based slavery, and a parallel effort to combat sex trafficking and  
8 prostitution. The first international instruments addressing slavery came out of the 1815  
9 Congress of Vienna, which produced the Declaration Relative to the Universal Abolition of the  
10 Slave Trade, addressing the transatlantic slave trade and the institution of slavery in the United  
11 States and European colonies.<sup>5</sup> Several twentieth century conventions address slavery and the  
12 broader issue of forced labor including: the 1926 Slavery Convention, adopted at a time when  
13 forced labor was seen as a function of colonialism; the 1930 Forced Labour Convention, which  
14 obligated signatory states to neither use forced labor nor tolerate it within their borders; and  
15 the 1957 Abolition of Forced Labour Convention, adopted after considerable study, concerned  
16 principally with the political uses of compulsory labor.<sup>6</sup> All three of these conventions and their  
17 definitions of slavery and forced labor remain relevant to international law today.<sup>7</sup>  
18 In the late nineteenth and early twentieth centuries, abolitionists who had successfully fought  
19 the transatlantic slave trade in Africans turned their attention to practices based on gender,  
20 often called “white slavery” to distinguish it from race-based slavery. The first international  
21 legal instrument that explicitly addressed what is now known as sex trafficking was the  
22 International Agreement for the Suppression of the White Slave Traffic of 1904, modified in  
23 1910.<sup>8</sup> This convention states that its purpose is the “effective protection against the criminal  
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1 traffic known as the White Slave Traffic,”<sup>9</sup> and explicitly links “white slavery” to the  
2 institution of prostitution. All of the signatories were European nations. Also limited to  
3 trafficking for sexual exploitation, the 1933 International Convention for the Suppression of the  
4 Traffic in Women of Full Age called for punishing anyone who “has procured, enticed or led  
5 away even with her consent, a woman or girl of full age for immoral purposes to be carried out  
6 in another country in order to gratify the passions of another person.”<sup>10</sup>

7  
8 These various agreements and others<sup>11</sup> culminated in the groundbreaking 1949 Convention for  
9 the Suppression of the Traffic in Persons and the Exploitation of the Prostitution of Others.

10 The 1949 Convention set the standard for instruments addressing sex trafficking by  
11 condemning trafficking and prostitution as “incompatible with the dignity and worth of the  
12 human person, endanger[ing] the welfare of the individual, the family, and the community.”<sup>12</sup>

13 It advocates punishment for those who engage in “exploitation of the prostitution of  
14 persons,”<sup>13</sup> and it calls for signatory nations to take “measures for the prevention of  
15 prostitution and for the rehabilitation and social adjustment of the victims.”<sup>14</sup>

16  
17 Yet another major international legal milestone in the campaign against trafficking was the  
18 1979 Convention on the Elimination of All Forms of Discrimination Against Women  
19 (CEDAW), a powerful contemporary tool for addressing human rights violations.<sup>15</sup> Adopted  
20 by the United Nations in 1979 and ratified by 186 countries (but not to date the United  
21 States),<sup>16</sup> the Convention seeks to eradicate gender-based discrimination by establishing basic  
22 international standards for the treatment of women. CEDAW addresses both sex and labor  
23 trafficking. It identifies trafficking in women and exploitation of the prostitution of women as  
24 practices of gender inequality and directs States Parties to “take all  
25  
26  
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28

1 appropriate measures to suppress all forms of traffic in women and exploitation of prostitution  
2 of women.”<sup>17</sup> Reinforced by the Beijing Platform for Action, adopted at the 1995 global U.N.  
3 Women’s Conference, CEDAW requires States to take appropriate measures to address the  
4 root causes of trafficking in women and girls for prostitution and other forms of commercial  
5 sex, forced marriages, and forced labor, including taking actions to strengthen legislation to  
6 protect the rights of women and girls and to punish perpetrators.<sup>18</sup>

7  
8 The most recent milestone in the international legal effort against human trafficking is the  
9 Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and  
10 Children, also known as the Trafficking or the Palermo Protocol. Unlike many of these earlier  
11 treaties, the Trafficking Protocol is not a human rights instrument but part of a larger treaty  
12 on organized crime.<sup>19</sup> The Trafficking Protocol’s reach is extensive. By covering compulsory  
13 or forced labor and sex trafficking and by protecting men, women, and children, it tackles the  
14 issues addressed in earlier disparate conventions. It advances international legal work against  
15 trafficking by establishing a uniform and comprehensive definition of trafficking; creating an  
16 obligation on signatory States to prevent, protect, and prosecute trafficking; and promoting  
17 international partnerships to combat trafficking. Its inclusive definition of trafficking and the  
18 specificity of its obligations make it the most significant international agreement addressing  
19 trafficking. The Protocol has 133 State parties, including the United States.  
20  
21

## 22 VIOLATION OF THE TVPRA

- 23  
24  
25 1. For general damages in the amount of \$\_\_40,000,000.00\_\_\_\_\_;  
26 2. For special damages for medical and related expenses in the amount of  
27 \$\_\_10,000,000.00\_\_\_\_\_;  
28

3. For damages for loss earnings in the amount of \$ \_\_\_\_ 10,000,000.00 \_\_\_\_;
- 4 For interest on said damages from \_\_\_\_ May 23,2014 \_\_\_\_\_, at 10% per annum
- 5 Costs of suit herein incurred; Attorneys Fees immediate Shelter
- 6 Such other and further relief as the court may deem just and proper.

## **SECOND CLAIM FOR RELIEF: BREACH OF CONTRACT**

1. For general damages in the amount of \$ \_\_ 40,000,000.00 \_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of  
\$ \_\_\_\_ 10,000,000.00 \_\_\_\_;
3. For damages for loss earnings in the amount of \$ \_\_ 10,000,000.00 \_\_\_\_;
- 4 For interest on said damages from \_\_\_\_ May 23,2014 \_\_\_\_\_, at 10% per annum
- 5 Costs of suit herein incurred; Attorneys fees Immediate Shelter
- 6 Such other and further relief as the court may deem just and proper.

## **THIRD CLAIM FOR RELIEF: RAPE**

1. For general damages in the amount of \$ \_\_\_\_ 40,000,000.00 \_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of  
\$ \_\_ 10,000,000.00 \_\_\_\_;
3. For damages for loss earnings in the amount of \$ \_\_ 10,000,000.00 \_\_\_\_;
- 4 For interest on said damages from \_\_ May 23 2014 \_\_\_\_\_, at 10% per annum  
From and after
- 5 Costs of suit herein incurred; Attorneys Fees Immediate Shelter
- 6 Such other and further relief as the court may deem just and proper.

## **FOURTH CLAIM FOR RELIEF: Violation of 42 USC §1983**

### **ACTING UNDER THE COLOR OF LAW**

1. For general damages in the amount of \$ 40,000,000.00 ;
2. For special damages for medical and related expenses in the amount of  
\$ 10,000,000.00 ;
3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;
- 4 For interest on said damages from May 23,2014 , at 10% per annum  
from and after.
- 5 Costs of suit herein incurred; and
- 6 Such other and further relief as the court may deem just and proper.

#### **FIFTH CLAIM FOR RELIEF: CONSPIRACY**

1. For general damages in the amount of \$ 40,000,000.00 ;
2. For special damages for medical and related expenses in the amount of  
\$ 10,000,000.00 ;
3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;
- 4 For interest on said damages from May 23,2014 , at 10% per annum  
From and after
- 5 Costs of suit herein incurred; and
- 6 Such other and further relief as the court may deem just and proper.

#### **SIXTH CLAIM FOR RELIEF: PREMISES LIABILITY**

1. For general damages in the amount of \$ 40,000,000.00 ;
2. For special damages for medical and related expenses in the amount of  
\$ 10,000,000.00 ;
3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;

4 For interest on said damages from \_\_\_\_ May 23,2014 \_\_\_\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys fees, Immediate shelter, Protection officers.

6 Such other and further relief as the court may deem just and proper.

**SEVENTH CLAIM FOR RELIEF: QUI TAM**

1. For general damages in the amount of \$ \_\_ 40,000,000.00 \_\_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_\_ 10,000,000.00 \_\_\_\_\_;

3. For damages for loss earnings in the amount of \$ \_\_ 10,000,000.00 \_\_\_\_\_;

4 For interest on said damages from \_ May 23 2014 \_\_\_\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys Fees Immediate Shelter.

6 Such other and further relief as the court may deem just and proper.

**EIGHTH CLAIM FOR RELIEF RACKETEERING:**

1. For general damages in the amount of \$ \_\_\_\_ 40,000,000.00 \_\_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_\_\_\_ 10,000,000.00 \_\_\_\_\_;

3. For damages for loss earnings in the amount of \$ \_\_ 10,000,000.00 \_\_\_\_\_;

4 For interest on said damages from \_\_ May 23,2014 \_\_\_\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys fees Immediate Shelter, Attorneys fees.

6 Such other and further relief as the court may deem just and proper.

NINTH CLAIM FOR RELIEF INTERFERENCE WITH EXISTING CONTRACT-INTENTIONAL

1. For general damages in the amount of \$ \_\_\_\_\_ 40,000,000.00 \_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of  
\$ \_10,000,000.00 \_\_\_\_\_;
3. For damages for loss earnings in the amount of \$ \_10,000,000.00 \_\_\_\_\_;
- 4 For interest on said damages from \_\_\_ May 23 2014 \_\_\_\_\_, at 10% per annum  
from and after.
- 5 Costs of suit herein incurred; Attorney Fees, Immediate Shelter, Protection Officers.
- 6 Such other and further relief as the court may deem just and proper.

TENTH CLAIM FOR RELIEF LEGAL MALPRACTICE

1. For general damages in the amount of \$ \_\_\_\_\_ 40,000,000.00 \_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of  
\$ \_\_\_\_10,000,000.00 \_\_\_\_\_;
3. For damages for loss earnings in the amount of \$ \_\_\_\_40,000,000.00 \_\_\_\_\_;
- 4 For interest on said damages from May 23, 2014\_\_\_\_\_, at 10% per annum from and  
after.
- 5 Costs of suit herein incurred; Attorneys Fees Security, Protection Officers, Immediate  
Shelter
- 6 Such other and further relief as the court may deem just and proper.

ELEVENTH CLAIM FOR RELIEF Violation of Human Rights act

1. For general damages in the amount of \$ \_40,000,000.00 \_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of  
\$ \_10,000,000.00 \_\_\_\_\_;
3. For damages for loss earnings in the amount of \$ \_10,000,000.00 \_\_\_\_\_;
- 4 For interest on said damages from \_\_May,23 2014\_\_\_\_\_, at 10% per annum  
from and after \_\_\_\_\_;
- 5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate  
Shelter
- 6 Such other and further relief as the court may deem just and proper.

#### TWELTH CLAIM FOR RELIEF VIOLATION OF CIVIL RIGHTS

1. For general damages in the amount of \$ \_40,000,000.00 \_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of  
\$ \_10,000,000.00 \_\_\_\_\_;
3. For damages for loss earnings in the amount of \$ \_10,000,000.00 \_\_\_\_\_;
- 4 For interest on said damages from \_\_May 23, 2014\_\_\_\_\_, at 10% per annum  
from and after.
- 5 Costs of suit herein incurred; Attorneys Fees Security, protection officers, Immediate  
Shelter
- 6 Such other and further relief as the court may deem just and proper.

THIRTEENTH CLAIM FOR RELIEF INTENTIONAL INTERFERENCE WITH ECONOMIC RELATIONS

1. For general damages in the amount of \$ 40,000,000.00 ;
2. For special damages for medical and related expenses in the amount of \$ ;
3. For damages for loss earnings in the amount of \$ ;
- 4 For interest on said damages from , at 10% per annum from and after ;

5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate Shelter

- 6 Such other and further relief as the court may deem just and proper.

FOURTEENTH CLAIM FOR RELIEF : BAD FAITH

1. For general damages in the amount of \$ 40,000,000.00 ;
2. For special damages for medical and related expenses in the amount of \$ 10,000,000.00 ;
3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;
- 4 For interest on said damages from May, 23,2014 , at 10% per annum from and after.

5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate Shelter

- 6 Such other and further relief as the court may deem just and proper.



FIFTEENTH CLAIM FOR RELIEF MONEY HAD AND RECEIVED

1. For general damages in the amount of \$\_\_40,000,000.00\_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of \$10,000,000.00;
3. For damages for loss earnings in the amount of \$\_\_10,000,000.00\_\_\_\_\_;
- 4 For interest on said damages from \_\_May 23 2014\_, at 10% per annum from and after.
- 5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate Shelter
- 6 Such other and further relief as the court may deem just and proper.

SIXTEENTH CLAIM FOR RELIEF: GROSS NEGLIGENCE

1. For general damages in the amount of \$\_\_40,000,000.00\_\_\_\_\_;
2. For special damages for medical and related expenses in the amount of \$\_\_10,000,000.00\_\_\_\_\_;
3. For damages for loss earnings in the amount of \$\_\_\_\_10,000,000.00\_\_\_\_\_;
- 4 For interest on said damages from \_\_\_\_\_May 23,2014\_\_\_\_\_, at 10% per annum from and after.
- 5 Costs of suit herein incurred; Attorneys Fees, Security protection officers, Immediate Shelter

6 Such other and further relief as the court may deem just and proper.

SEVENTEENTH CLAIM FOR RELIEF CLAIM FOR RELIEF PROFESSIONAL  
NEGLIGENCE

1. For general damages in the amount of \$ 40,000,000.00 ;

2. For special damages for medical and related expenses in the amount of  
\$ 10,000,000.00 ;

3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;

4 For interest on said damages from May 23,2014 , at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

EIGHTEENTH CLAIM FOR RELIEF : UNJUST ENRICHMENT

1. For general damages in the amount of \$ 40,000,000.00 ;

2. For special damages for medical and related expenses in the amount of  
\$ 10,000,000.00 ;

3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;

4 For interest on said damages from May 23, 2014 , at 10% per annum  
from and after.

5 Costs of suit herein incurred;Attorneys Fees Security protection officers Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

NINETEENTH CLAIM FOR RELIEF : WILLFUL MISCONDUCT

1. For general damages in the amount of \$\_\_\_\_\$40,000,000.00\_\_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$\_\_10,000,000.00\_\_\_\_\_;

3. For damages for loss earnings in the amount of \$\_\_10,000,000.00\_\_\_\_\_;

4 For interest on said damages from \_\_May 23, 2014\_\_\_\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

TWENTIETH CLAIM FOR RELIEF :NEGLIGENT ENTRUSTMENT

1. For general damages in the amount of \$\_\_40,000,000.00\_\_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$\_\_10,000,000.00\_\_\_\_\_;

3. For damages for loss earnings in the amount of \$\_\_10,000,000.00\_\_\_\_\_;

4 For interest on said damages from \_\_\_\_\_May 23, 2014\_\_, at 10% per annum from  
and after.

5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

TWENTY FIRST CLAIM FOR RELIEF: UNFAIR COMPETITION VIOLATION OF PUBLIC  
POLICY

1. For general damages in the amount of \$ 40,000,000.00 ;

2. For special damages for medical and related expenses in the amount of  
\$ 10,000,000.00 ;

3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;

4 For interest on said damages from May 23, 2014, , at 10% per annum  
from and after.

5 Costs of suit herein incurred;Attorneys Fees Security protection officers Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

TWENTY SECOND CLAIM FOR RELIEF : BREACH OF PRIVACY

1. For general damages in the amount of \$ 40,000,000.00 ;

2. For special damages for medical and related expenses in the amount of  
\$ 10,000,000.00 ;

3. For damages for loss earnings in the amount of \$ 10,000,000.00 ;

4 For interest on said damages from \_\_\_\_ May 23, 2014, \_\_\_\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

#### TWENTY THIRD CLAIM FOR RELIEF :WRONGFUL DEATH

1. For general damages in the amount of \$ \_\_\_\_ 40,000,000.00 \_\_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_ 10,000,000.00 \_\_\_\_\_;

3. For damages for loss earnings in the amount of \$ \_\_\_\_ 10,000,000.00 \_\_\_\_\_;

4 For interest on said damages from \_\_ May 23, 2014 \_\_\_\_, at 10% per annum from and  
after.

5 Costs of suit herein incurred; Attorneys Fees Security protection officers Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

#### TWENTY FOURTH CLAIM FOR RELIEF :Trespass to Chattels/ Conversion/

1. For general damages in the amount of \$ \_\_\_\_ 40,000,000.00 \_\_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_\_ 10,000,000.00 \_\_\_\_;

3. For damages for loss earnings in the amount of \$ \_\_\_\_ 10,000,000.00 \_\_\_\_;

4 For interest on said damages from \_\_\_\_ May 23, 2014\_\_\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys Fees, Protection Officers, Immediate Shelter.

6 Such other and further relief as the court may deem just and proper.

TWENTY CLAIM FOR RELIEF :5TH Civil Theft

1. For general damages in the amount of \$ \_\_ 40,000,000.00 \_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_\_\_\_ 10,000,000.00 \_\_\_\_;

3. For damages for loss earnings in the amount of \$ \_\_ 10,000,000.00 \_\_\_\_;

4 For interest on said damages from \_\_ May 23, 2014\_\_\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys Fees Security, Protection officers, Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

TWENTY SIXTH CLAIM FOR RELIEF : NEGLIGENT SUPERVISION

1. For general damages in the amount of \$ \_\_\_\_ 40,000,000.00 \_\_\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_\_ 10,000,000.00 \_\_\_\_;

3. For damages for loss earnings in the amount of \$ \_\_\_\_ 10,000,000.00 \_\_\_\_;

4 For interest on said damages from \_\_May 23, 2014\_\_, at 10% per annum  
from and after.

5 Costs of suit herein incurred; Attorneys Fees Security, Protection officers, Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

## TWENTY SEVENTH CLAIM FOR RELIEF : INTERSTATE STALKING

1. For general damages in the amount of \$ \_\_40,000,000.00\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_10,000,000.00\_\_;

3. For damages for loss earnings in the amount of \$ \_\_\_\_10,000,000.00\_\_;

4 For interest on said damages from \_\_MAY 23 2014\_\_, at 10% per annum

5 Costs of suit herein incurred; Attorneys fees, Immediate shelter, Protection officers.

6 Such other and further relief as the court may deem just and proper.

## TWENTY EIGHTH CLAIM FOR RELIEF: TORTURE

For general damages in the amount of \$ \_\_\_\_40,000,000.00\_\_;

2. For special damages for medical and related expenses in the amount of  
\$ \_10,000,000.00\_\_;

3. For damages for loss earnings in the amount of \$ \_\_\_\_10,000,000.00\_\_;

4 For interest on said damages from \_\_\_\_ May 23, 2014\_\_\_\_\_, at 10% per annum  
from and after

5 Costs of suit herein incurred; Attorneys Fees Security, Protection officers, Immediate  
Shelter

6 Such other and further relief as the court may deem just and proper.

## 7 DAMAGES

8 As a direct result of the Trafficking and sexual assault by Goguen, Plaintiff has  
suffered, and continues to suffer, from psychological damages, including, but not  
9 limited to, depression, anxiety, anger, flashbacks, and nightmares Complex ptsd physical  
pain and suffering homelessness.

11 Plaintiff also suffered psychological trauma affecting several areas of  
her life, including but not limited to their personality, self-esteem, sexuality,  
12 relationships, and career.

13 Further, for the undetermined future, Plaintiff must relive her sexual  
assault everyday due to the inescapable coverage of Goguen's federal criminal sex  
14 trafficking and payments the the media to falsify the narrative.

16 Moreover, Plaintiffs psychological and physiological damages have been  
debilitating, and have prevented her from understanding and asserting her legal  
17 rights. Her own lawyers degraded her and violated her rights, Law enforcement and  
Multiple State and Federal Judges trampled upon her rights in a criminal capacity.  
18 Additionally, Plaintiff has feared and has been intimidated by Goguen, Goguens  
Prostitutes, Goguens employees, Sequoia Capital, Goguens Two Bear Ranch, Two bear  
19 Capital and their agents, law enforcement and Goguen lawyers and all the men hired to  
stalk and murder Amber,

22 Goguens wealth, his close connections to Corrupt government officials, law  
enforcement Senators, governors, CIA, FBI, Goguens Corrupt law firms Sequoia's  
23 Corrupt Law Firms and their connections and back scratching quid pro quo antics and  
claims to be the most feared law firm in the world when in fact these lawyers are  
24 criminals and not good lawyers simply breaking the law and perverting the course of  
justice on belief of serial rapists this are vulgarians of the NTH degree. Because of  
25 Goguen Sequoia capital and Quinn Emanuels criminal misconduct and conspiracy against  
Amber she is forced to face this alone and represent herself as they tamper with every  
26 lawyer Amber hires.



1 Amber now has to face one of the most powerful organized crime Syndicates in the  
2 world, The governments, powerful political, business and legal leaders, and the retaliation  
3 will be unfathomable. The crimes committed against Amber thus far are not only crimes  
4 against her but against humanity as a whole. The people have the right to know the society  
5 we live in and who walks feeling amongst us inclusive of the government and Judicial  
6 corruption.

7 Violation of The Trafficking Victims Protection Act 18 U.S.C. §1591  
(Plaintiffs Amber and Every Girl Counts Against All Defendants)

8 Plaintiffs repeat and re-allege each and every allegation as set forth in  
9 the preceding paragraphs as if set forth in full herein.

10 Michal Lewis Goguen recruited and enticed Plaintiff by initiating a an abusive  
11 commercial sexual

12 relationship with her. Through her traffickers The Gang, Roe, Goguen invited and  
13 recruited

14 Plaintiff to be his friend in exchange for education and safety from the gang.

15 the Education safety of money being of  
16 value to the Plaintiff. A meeting with a wealthy man like Goguen was also of  
17 considerable value for a victim of human trafficking. Amber was not hunting for a Sugar  
18 Daddy she was a teenage victim of Gang Crime.

19 Goguen knew this and exploited her further in every way his deviant mind could come  
20 up with. He told her repeatedly he loved her( A Thing) so he was keeping her in an  
21 emotion cage. Those are Goguen's very worlds not Ambers. If that was the least he did to  
22 Amber it would be extremely damaging.

23 Based upon the representations by Goguen these invitations  
24 reasonably led Plaintiff to believe there may be freedom from the slavery exploitation and  
25 sexual abuse. Plaintiff reasonably relied upon the monetary promises the contract Goguen  
26 and his lawyers legal and financial advice and understood that her identity would be  
27 protected under the personal injury settlement agreement (contract).

28 When Amber signed the contract that she wrote Goguen nor his agents informed Amber  
that should Goguen breach the contract Amber would have to proceed to trial no longer as  
Jane Doe to protect her from the gang.

one Of the thousands of wrong doings by Goguen Sequoia and their agents.

All of Goguen's fraudulent and enticing offers for  
harmless dinner turned into a now 22 year nightmare, a living hell.

Goguen knew that he would engage in fraudulent Drugging and raping amber and luring  
her into Goguen Sex enterprise as his sex slave.

1 Goguen Knew her would convert Ambers naivety and innocence into rape and sexual  
2 slavery.

3 Once he knowingly recruited and lured her with the idea that she could gain her freedom  
4 and that he loved her and wanted her to be free from slavery and enticed Plaintiff to  
5 appear at

6 His hotels which the are essential to sex trafficking operations as are bars taxis airplanes  
7 automobiles buses ships and trains. For sex trafficking to thrive, it requires at least 3  
8 things. First victims, often referred to s modern-day-slaves, a sex trafficking victim is  
9 treated as property mere cattle by her traffickers. The victim retains little or no money and  
10 remains dependent up her trafficker for the most basic necessities Shelter medication  
11 Identification food water and clothing.

12 Franchisers were trained not to turn a blind eye on human trafficking yet Hotels remain a  
13 major player in human trafficking.

14 The franchisers have long known how to spot and deter sex trafficking Since 2004 End  
15 Child prostitution and trafficking ECPAT\_USA) < Promoted the tourism child protection  
16 cod of conduct (code). Well known in the hospitality industry, the code identifies six  
17 steps hotels should take to combat sex trafficking. Additionally , the department of  
18 homeland security identifies specific signs that suggest the presence of sex trafficking at  
19 hotels signs of which the franchisers were well aware. By 2013, hotel industry  
20 representatives knew that 8 out of 10 human trafficking arrests happen at hotels. The  
21 franchisers of the Hotels where Goguen and Sequoia Capital trafficked Amber knew of  
22 the epidemic of Sex trafficking, it's dependance on connection to hotels, and prevalence of  
23 the problem in America and globally.

24 There is no point of the TVPRA if Judges the FBI, CIA, Law enforcement are all willing  
25 to violate it if they can get money in the bank for themselves. That must be put to an end  
26 immediately so victims can be freed.

27 At its most basic level , the TVPRA criminalizes sex trafficking- the use of force , fraud,  
28 coercion to cause a person to engage in a commercial sex act. But congress added a civil  
cause of action against both the perpetrator of the sex trafficking crime and “anyone who  
knowingly benefits, financially or by receiving anything of value from participation in a  
venture which that person knew or should have known has engaged in” such a criminal  
violation. 18 U.S.C. \* 1595(a). The franchisers are precisely the type of defendant  
Congress had in mind when it devised this remedy.

Second traffickers profit from the forced labor of their victims. Traffickers force young  
women and underage girls to engage in commercial sex acts. Stripping may not be sex but  
however Child pornography and Stripping are commercial sex acts.

Traffickers control victims trough force, using violence and treats of violence and threats  
of violence to restrain, beat, and drug them. And they control victims through fraud and  
coercion. employing emotional and psychological manipulation, trauma, and isolation.

1 Third, Sex trafficking requires venues, a place where victims can be sold for sex to as  
2 many buyers as possible. In Globally Sex trafficking ventures typically operate in bars  
3 and hotels. Michael Goguen and Sequoia Capital arranged and paid for rooms for Amber  
4 to be trafficked and raped in.

Hotels have profited fro Ambers Slavery and rape.

5 Hotels ,Airports, Airplanes, All commercial modes of transportation Law enforcement  
6 have long been trained to spot human trafficking Goguen then engaged in commercial sex  
acts with Plaintiffs

7 by forcibly fondling and raping Amber intentionally infecting her body with Sexually  
8 transmitted disease, including tearing a hole in her genitals, for sexual gratification under  
the

9 fraudulent guise of love and friendship “the burnered bond” in exchange for freedom  
10 safety,Shelter, medical care, education and money .

Goguen intended that his fraud and force to cause these sex acts to take place.

11 Goguen, The Gang, Sequoia Capital And Goguens agents recruited Amber, knowingly  
12 and intentionally conspired  
with Goguen to facilitate the fraud and sexual abuse of Plaintiff.

13  
14 Plaintiff initially complied with Goguens orders during the abuse as she did not feel she  
15 had any choice. The abuser that you know seems better that the abuser you have yet to  
meet.

16 Goguen was very adept at raping and grooming his victims by the time he was introduced  
17 to Amber. He conspired with he gang to have Amber as his possession a mere blow up  
18 doll to him. When Goguen began to  
touch Plaintiff in an aggressive, sexual manner, Plaintiff was terrified and froze. The  
sexual abuse commenced that day.

19 Indeed, through his fraudulent representations, Goguen had isolated  
20 Plaintiff in His hotel room at the Omni Hotel in Richardson Texas, Where he would come  
to meetings with Oracle. This indicated to

21 Plaintiff and along with Goguens statements was a very wealthy, powerful man. Plaintiff  
22 felt she had no  
other choice but to comply with this man's orders. She cried and begged to leave he let her  
23 leave but the damage was done Goguen began grooming her to be is sex slave in his self  
proclaimed harem.

24 Goguens promises, as relayed to Amber, were made in relation to the  
25 payment for sex services, which affects interstate commerce. Amber told Goguen from the  
26 first hour they met that she was not a prostitute. He said he just wanted to take her for  
dinner and that she was safe with him. He demeaned and degraded her told her she was  
27 not good enough to be seen with in public. The abuse began from the first time she went  
28

1 to see him for dinner. A dinner that never took place as he lured her to the Omni hotel in  
2 Richardson Texas. Paid for by Sequoia Capital.

3 Goguens

4 Sex enterprise money for commercial sex acts has a substantial effect on  
5 interstate commerce.

6 Goguens use of his position as a powerful, wealthy man to otherwise  
7 engage in raping Amber was for the purpose of his own sexual  
8 gratification.

9 Michael Lewis Goguen the demonic psychopathic serial rapist, pedophile and Sex  
10 trafficker began by becoming more sexually aggressive, made sexual advances, and  
11 masturbated. Goguen forcefully and without warning, grabbed Ambers breasts  
12 and vagina and then masturbated to completion on her face and hair on an air mattress.  
13 After Goguen ejaculated, he told Amber that she was to refer to him and a king or an  
14 emperor throughout time. Goguen called himself an emperor. In the beginning Goguen  
15 gave Amber zero money for the Sexual Abuse. He promised for over a year That he  
16 would soon help her escape from the Gang and go to university. After drugging and  
17 Raping Amber none of which she can remember in the summer on 2003 he put an  
18 envelope with \$7000.00 in her hand bag. Amber told Goguen he could not pay her for sex.  
19 He just did whatever he wanted. Clearly he knew Amber could not escape nor could he  
20 pay for medical school with \$7000.00 this was only a furtherance of his grooming of  
21 amber to be his sex slave.

22 Amber was planning to run away with the money and escape the gang by joining a  
23 Convent or Joining the US army. That was all she could think of to gain her freedom from  
24 the gang. Before she could run Traffickers beat her and she ended up in the hospital with a  
25 head injury.

26 Goguen was aware of all of this.

27 He fully took advantage of this and sodomized amber shortly there after.

28 Approximately 2 months later Goguen Drugged and Raped Amber in the Sheraton Hotel  
in Toronto where he transported her for the purposed of rape. Sequoia capital paid for the  
Hotel and travel.

To the best of plaintiffs recollection this is the first time Goguen Anally raped amber after  
drugging her glass of champagne which Goguen ordered poured and handed to her. the  
sexual abuse only intensified form that date onward.

On information and belief, Goguen routinely paid traffickers for use Of Amber. He had a  
long had standing relationship with them before Amber was trafficked by the Gang to  
Texas. This is Goguens modus operandi.

Goguen was by no means the Most powerful famous or most wealthy man in these  
destinations of sex trafficking that Amber was introduced to. Amber did not know or

1 consider Goguen to be famous she believed him to be a computer geek with nothing of  
2 interest to say. He was a pervert. Amber did not recognize Goguen and had no knowledge  
3 of what a venture capitalist was. She did not care she wanted to save her life and go to  
4 medical school. The Gang forced Amber to bare her naked body for in rooms of  
5 thousands of people any way they could abuse and humiliate her into compliance they did.  
6 Inclusive of making a young teenage girl stand on a public stage with menstrual blood  
7 flowing out of her body. Inclusive of forcing her to drink a bottle of hot urine as  
8 punishment. Inclusive of beating her, starving her, locking her in the basement of the club  
9 with no lights and no lavatories and no water.

10 As a result of Defendants Goguen, Sequoia Capital, Two bear Capital Two bear Ranch  
11 Two bear Air And all of their agents including the judges and lawyers and “private  
12 investigators” heinous and willful conduct, THERE ARE ZERO LEGAL BASIS FOR  
13 ANY CROSS COMPLAINTS IN THIS CASE YOU ARE ALL GUILTY.

14 Plaintiff is entitled to compensatory damages, punitive damages, Exemplary damages,  
15 Special damages treble damages attorney's fees, immediate housing Security protection  
16 officers.  
17 costs, and all other appropriate relief.

#### 18 PRAYER FOR RELIEF ON CLAIMS

19 WHEREFORE, Plaintiffs pray that this Court:

20 A. Award Plaintiffs Amber Doe and Every Girl Counts all of their damages under The  
21 Trafficking Victims

22 Protection Act 18 U.S.C. § 1595, the civil remedy for violation of The Trafficking  
23 Victims Protection Act 18 U.S.C. § 1591, and common law, including  
24 compensatory damages and punitive damages in an amount of \$1,000,000,000.00 or  
25 in an amount to be determined at trial.

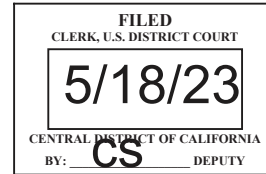
26 Amber is to be awarded 1 trillion dollars before her death so she can end human  
27 trafficking globally because nobody is doing anything and every hum has the right to  
28 freedom and peace.

If Amber Dies soon she will appoint a large board to facilitate her wishes.

29 B. Award Plaintiffs all attorney's fees, costs and expenses available under  
30 law.'

31 C. Award Plaintiffs all pre-judgment interest and post judgment interest  
32 available under law; and

33 D. Award Plaintiffs such additional and further relief as this Court may  
34 deem just and proper.



Amber Doe  
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Los Angeles, CA 90211  
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[amberlitigate@gmail.com](mailto:amberlitigate@gmail.com)  
Propia Persona

UNITED STATES DISTRICT COURT  
DISTRICT OF  
Los Angeles  
For removal to The Supreme Court of the United States  
Writ of Certiorari In Preparation

Amber Doe,	)	Case No. CV23-2280-MEMF(SK)
	)	
Plaintiff,	)	
	)	
vs.	)	<b>Plaintiffs MOTION TO DISQUALIFY QUINN</b>
	)	<b>EMANUEL URQUHART &amp; SULLIVAN LLP</b>
Michael Lewis Goguen, Sequoia Capital, Two	)	
Bear Capital, Quinn Emanuel, Wilson, Sonsini,	)	
Goodrich& Rosati, Goodwin Procter, The United	)	<b>DEPT: 8B</b>
States of America, Cristopher Reynolds, Galser	)	<b>JUDGE: CV23-2280-MEMF(SK)</b>
Weil, Bisnar Chase, Nemeck and Cole, San	)	
Mateo Court Orange County Court, Oranch	)	
Couty, San Mateo County, See Interested parties	)	

TO THE CLERK OF THIS COURT AND ALL OTHER INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that **CAPACITY OF PARTY SUCH AS PLAINTIFF,**



1 **NOTICE OF MOTION AND MOTION TO ALL PARTIES AND THEIR ATTORNEYS OF**  
2 **RECORD: PLEASE TAKE NOTICE that on Friday May 18, 2023 or as soon thereafter as**  
3 **may be heard before the Honorable Maame Ewusi-Mensah Frimpong**  
4

5 **District Judge**

6 **United States Courthouse, 350 West First Street, Los Angeles, CA, 90012, Courtroom 8B, 8th**  
7 **Floor**

8 **of the United States District Court for the Southern District of California, Western Division**

9 **Los Angeles will and hereby do move this Court for an order disqualifying Quinn Emanuel**

10 **Urquhart & Sullivan, LLP (“Quinn Emanuel”), from representing Michael Lewis Goguen,**

11 **Sequoia Capital, Two Bear Capital, Any and all companies owned By Michael Lewis Goguen ad**

12 **Sequoia Capital, They must not be allowed to represent any defendant in the instant case as**

13 **they have a self serving reason to do so in furtherance of obstruction of justice The must be**

14 **barred from representing any and all parties in this action. Amber Doe respectfully requests**

15 **that the Court disqualify Quinn Emanuel lawyers from representing QUINN EMANUEL**

16 **URQUHART & SULLIVAN LLP . They have a monopoly on the legal profession and act at all**

17 **times in regards to Plaintiff Amber Doe with SUPREME and Absolute Malice. These criminal Quinn**

18 **Emanuel lawyers must forever be barred from interfering on any way with Amber Doe’s medical**

19 **treatment and hiring men to stalk Amber doe and unknowing 3rd parties.**  
20  
21  
22  
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1  
2  
3  
4 Amber Doe HEREBY OBJECTS to QUINN EMANUEL URQUHART & SULLIVAN LLP  
5 Repressing Michael Lewis Goguen Repressing the law firm of MOTION TO DISQUALIFY QUINN  
6 EMANUEL URQUHART & SULLIVAN LLP or any other Defendant is this lawsuit They are both  
7 witnesses and defendants in the instant case. They are a mafia of unethical lawyers guilty on all  
8 counts of legal misconduct of the ENTH degree they have obstructed the judicial Process in regards  
9 to Amber Doe for well over 9 years see the Complaint in the instant case. they Continue to violate  
10 Amber Does human rights, Civil rights, Constitutional rights. QUINN EMANUEL URQUHART &  
11 SULLIVAN LLP and all lawyers associated with them working in collusion to force Amber Doe to  
12 Die Prematurely have become her Human traffickers illegally profiting ff of Amber Does sexual  
13 exploitation they have particpatited in but not limited to. Bribing Judges, Controlling Jams Referee  
14 Reed Ambler Who Amber Doe Was Forced to pay \$900.00 Per hour to act as discovery referee only  
15 not a motion Judge, frudulenlty inducing Amber to to Fire her lawyer ,Conspiring with Amber Does  
16 Lawyers, Paying Amber Does Lawyers to abdomen Her case. Tampering with and Threatening  
17 Amber Does Doctors and Surgeons, Paying Lawyers and Judges In Canada to Deprive Amber of Her  
18 Rights, Bribing 3rd Party Witnesses Lawyers, Suborning Perjury, Hiring and Instructing multiple men  
19 to stalk Amber Doe and more that 60 Third parties some of which had never hear Of Amber Doe,  
20 Stalking and threatening the elderly , Cancer patients, Stalking Single mothers, doing Video  
21 Surveillance on Small Children on private properties, Paying money to witnesses to give false  
22 testimony, tampering with witnesses, The lawyers themselves went to doorsteps of other rape victims  
23  
24  
25  
26  
27  
28



1 and paid them to remain silent, Attempting To silence Amber Doe so that Michael Lewis Goguen can  
2 Continue to rape and violate girls and women through his sex trafficking conspiracy Goguen Sex  
3 enterprises, Providing Amber Doe with FAKE hearing dates so that she can not defend herself in  
4 court, Not serving Legal pleadings to Amber Doe, Lying to the police and sheriffs about the Stalking  
5 of Amber Doe, Inciting gang violence intentionally, Fraudulently inducing the Courts and  
6 Fraudulently procuring Judicial Signatures on documents knowing “they” Goguen and Quinn  
7 Emanuel are in violation of 244 Laws and causes of action.  
8  
9

10 MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP at any further  
11 hearings or proceedings concerning this action. Said objection is based on the grounds and upon the  
12 facts set forth in the declaration of Amber Doe and exhibits attached thereto, concurrently filed and  
13 served herewith and incorporated herein by reference.  
14  
15

## 16 MEMORANDUM OF POINTS AND AUTHORITIES

### 17 I.

#### 18 STATEMENT OF FACTS

19  
20 This case is **CIVIL ACTION For Human Trafficking Rape And 242 additional causes of**  
21 **action and Violations of the law by the perpetrator Michale Lewis Goguen his lawyers**  
22 **companies agents “investigators and all people hired by them. Quinn Emanuel lawyers have**  
23 **acted in SUPREME ABSOLUTE MALICE and have obstructed justice on behalf of Micheal Lewis**  
24 **Goguen for over 9 years and Victimized Amber Doe**  
25  
26  
27  
28

1 Amber Doe objects MOTION TO DISQUALIFY QUINN EMANUEL URQUHART &  
2 SULLIVAN LLP at any further hearings or proceedings concerning this action on the grounds that a  
3 person aware of the facts might reasonably entertain a doubt that these malicious lawyers could  
4 conduct themselves with in the law and what would be considered reasonable by society. They are  
5 one of the most powerful law firms in the country they have connecting to the government and the  
6 judiciary. They must be disqualified from the instant case for they will continue to obstruct Justice and  
7 Amber Doe will forever lose her life and right to a trial by Jury.  
8  
9 They render the courts unable to function thru their constant abuse of the legal process. The just  
10 would never be able to be impartial he has already been made aware that Plaintiffs rights have been  
11 violated and that she is not being served the pleadings or times and dates that MOTION TO  
12 DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP who are both witnesses and  
13 defendants in the instant and are proceeding before the Judge and obtaining his signature on legal  
14 documents without serving Plaintiff or informing her of hearings. Refer to court record.  
15  
16  
17  
18  
19

20 The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the  
21 grounds that: This case was filed March 28th 2023. Within 5 days of the date of filing the complaint  
22 for human trafficking rape premises liabilities and 241 additional causes of action and violations of  
23 the law The fee waiver should have been granted as I have declared under penalty of perjury that I  
24 can not afford to pay for filing fees in the instant case or the the filing fees in the several other cases  
25 where my situation of human trafficking is being explored for profit by dozens if not hundreds of  
26  
27  
28

1 lawyers from the largest law firms in the unites states. 50 days after the filing of the fee waiver it still  
2 has not been granted by Hon. Steve Kim.

3 Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful  
4 defendants has no law degree and is in dire need of medical treatment which has been removed from  
5 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
6 denied Legal Aid And public Counsel.  
7

8 In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His  
9 lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and  
10 refused to serve a single pleading or notice to Amber Doe although she makes several demands for  
11 service of the pleadings per week.  
12

13 Amber Has today the Court that she is not Being served legal pleadings discovery motions or  
14 anything related to at least tree cases where she is either the plaintiff or defendant.  
15

16  
17 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the  
18 Lawyers in this case since Feb 2014. It is Now May 2023.  
19

20  
21 Amber Doe Does not know how the Lawyers from Quinn Emanuel are obtaining Signatures From  
22 Hon. Steve Kim on the motions they file as she can not see any hearing date nor can she see any Nor  
23 can she see underrated pleadings because they are not on pacer.  
24

25  
26 Plaintiffs motion for Defendants Judgement Should be granted not Delayed as the law is clear  
27 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint  
28

1 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim  
2 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
3 humanity.  
4

5  
6 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
7 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
8 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
9 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
10

11  
12 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form of  
13 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has  
14 never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
15 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
16 it was procured through fraudulent inducement of a judge and bribery Such gag order was signed first  
17 by Hon. Danny Chao after he was bribed. The Second Order signed By Hon. Elizabeth Lee after  
18 Quinn Emanuel Lawyers again acted with Malice and Served plaintiff only the pleadings they felt  
19 like serving plaintiff and intentionally obstructed the Judicial process by Suddenly changing the date  
20 of the hearing and in addition providing Plaintiff with a fake Hearing time of 1:00 pm when they  
21 knew the hearing was set for 9:00 am and they did not provide playoff of the court room nor the  
22 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or  
23 defend herself.  
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1 The Court Denied Amber Does request for E-filing for no reason. It is mandatory for the lawyers to  
2 utilize e-filing. Plaintiff has expressed that she is homeless without medical treatment and this will  
3 cause her a pre-mature death. She has no money to pay for shipping fees for filings she has no money  
4 for paper and printing services. E-filing is extended to mostly everyone else and is better for the  
5 environment. The request for exiling should have been granted.  
6

7  
8 The court exerts that Plaintiff made Ex-parte Communications to the Court which lawyers and  
9 People without lawyers are allowed and instructed to email the clerk and the clerks email them in  
10 response. Plaintiff never spoke to the Judge nor did she bribe the judge she followed the instructed  
11 protocol. The Clerks in the office instructed Amber Doe to email the Clerk and speak to the Deputy  
12 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
13 Judgement heard Before the Judge.  
14

15  
16 Again If defendant Michael Lewis Goguen and His lawyers did not force Amber Doe to fire her  
17 lawyer and subsequently bribe and conspire with her former lawyers plaintiff would not be  
18 requesting a hearing time from the deputy clerk.  
19

20  
21 Plaintiffs motion for Defendants Default Judgement Should be granted not Delayed as the law is clear  
22 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint  
23 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim  
24 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
25 humanity.  
26  
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28

1 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
2 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
3 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
4 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
5

6  
7 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form of  
8 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has  
9 never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
10 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
11 it was procured through fraudulent inducement of a judge and bribery Such gag order was signed first  
12 by Hon. Danny Chao after he was bribed. The Second Order signed By Hon. Elizabeth Lee after  
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16 knew the hearing was set for 9:00 am and they did not provide playoff of the court room nor the  
17 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or  
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9 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
10 Judgement heard Before the Judge. Again If defendant Michael Lewis Goguen and His lawyers did  
11 not force amber Doe to fire her lawyer and subsequently bribe and conspire with her former lawyers  
12 plaintiff would not be requesting a hearing time from the deputy clerk.  
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16 Bias exists where the judge evidences a “predisposition to decide a cause or an issue in a  
17 certain way, which does not leave the mind perfectly open to conviction.” The judge's bias toward a  
18 party is clearly ground for disqualification. *Pacific & Southwest Annual Conf. of United Methodist*  
19 *Church v. Sup.Ct. (Barr)* (1978) 82 Cal.App. 3d 72, 86.  
20

21 **B. THE STATUTES GOVERNING DISQUALIFICATION FOR CAUSE IN**  
22 **CALIFORNIA ARE INTENDED TO ENSURE PUBLIC CONFIDENCE IN THE**  
23 **JUDICIARY AND TO PROTECT THE RIGHTS OF LITIGANTS TO A FAIR AND**  
24 **IMPARTIAL ADJUDICATOR AND THE UNITED STATES SUPREME COURT HAS**  
25 **STATED THAT A FAIR TRIAL IN A FAIR TRIBUNAL IS A BASIC REQUIREMENT OF**  
26 **DUE PROCESS**  
27  
28

1 The conduct exhibited by Judge Steve Kim showed clear evidence of bias and prejudice and  
2 deprived Amber Doe of their right to a fair and impartial adjudicator. This conduct also deprived him  
3 of his right to a fair trial in a fair tribunal which is a basic requirement of due process as stated by the  
4 United States Supreme Court.  
5

6 The California Supreme Court has stated that the, "Statutes governing disqualification for  
7 cause are intended to ensure public confidence in the judiciary and to protect the right of the litigants  
8 to a fair and impartial adjudicator." *Curle v. Superior Court* (2001) 24 Cal.4th 1057, 1070.  
9

10 The United States Supreme Court has stated that, it is "axiomatic that [a] fair trial in a fair  
11 tribunal is a basic requirement of due process." *Caperton v. A. T. Massey Coal Company*, (2009)  
12 556 U.S. 868, 876. In *Caperton* the Supreme Court also stated that the due process clause of the  
13 federal Constitution (US Const amend XIV) can require judicial disqualification even in cases where  
14 the party requesting disqualification has not complied with any applicable state disqualification  
15 statutes, and that a showing of actual bias is not required for judicial disqualification under the due  
16 process clause.  
17  
18

19 "The Due Process Clause entitles a person to an impartial and disinterested tribunal..."  
20 *Marshall v. Jerrico, Inc.* (1980) 446 U.S. 238, 242; see also *Brown v. American Bicycle Group, LLC*,  
21 (2004) 224 Cal.App.4th 665, 674.  
22

23 The well-established common law rule is that recusal is required when a judge has a direct,  
24 personal, substantial, or pecuniary interest in a case. *Caperton v. A.T. Massey Coal Co.*, supra, 556  
25 U.S. at p. 876-77; see also *Aetna Life Ins. Co. v. Lavoie*, (1986) 475 U.S. 813, 820.  
26

27 Judges have a duty to make their decisions free from any bias or prejudice. *Cal Rules of Ct*,  
28 Standards of J Admin 10.20; Cal Rules of Ct, *Code of Judicial Ethics*, Canon 3B(5).



“(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the performance of judicial duties, engage in speech, gestures, or other conduct that would reasonably be perceived as (1) bias or prejudice, including but not limited to bias or prejudice based upon race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, or (2) sexual harassment. “

Judge also have a duty to require lawyers in proceedings before them to refrain from manifesting any bias or prejudice. *Code of Judicial Ethics*, Canon 3B(6).

“(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting, by words or conduct, bias or prejudice based upon race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation against parties, witnesses, counsel, or others.”

Judges have a duty to allow every party to a legal proceeding the full right to be heard according to law. *Code of Judicial Ethics*, Canon 3B(7).

“(7) A judge shall accord to every person who has a legal interest in a proceeding, or that person’s lawyer, full right to be heard according to law.”

**C. Amber Doe HAS SHOWN COMPELLING EVIDENCE IN SUPPORT OF her OBJECTION see court record Pacer and Complaint no filing has been served on Amber Doe by defendants in the instant case yet they have procured multiple signatures from Hon. Steve Kim on their pleading that they have not served Plaintiff nor have they provided her the signed copies and she has no access to a credit card as Quinn Emanuel tampered with Amber Does banks and demanded they remove her access to all credit products inclusive of credit cards so**

1 she has no ability to pay for downloads from Pacer or the Orange County Court website in the  
2 court where the Judges are allowing proceedings to move forward against Amber Doe with no  
3 regard for the fact that the lawyers are conspiring together to obtain \$ 100 million dollars for  
4 no reason while Amber Doe suffers debilitating medical conditions caused by defendants abuse  
5 and has no shelter because of defendants abuse and continues to be stalked by multiple men  
6 that she does not know. Amber Doe has no ability to download more than the limited \$30 per  
7 quarter in documents from pacer.  
8

9  
10 In furtherance of the aforementioned The Judges/Justices are aware that the illegally procured  
11 “gag order” and the Illegal selling of the case to cover Up the crimes committed against  
12 Plaintiff do not extend to the Courts in Canada, England ,France, Japan, Puerto Rico, The  
13 Virgin Islands, China or any other country where Amber Doe was trafficked and must file cases  
14 against defendants so that she can finally gain her freedom and obtain Medical treatment,  
15 Food, Shelter, Safety and Peace.  
16

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18  
19 **THUS DISQUALIFICATION IS REQUIRED IN THE INTERESTS OF JUSTICE**

20 **III.NOTICE OF MOTION AND MOTION TO ALL PARTIES AND THEIR**

21 **ATTORNEYS OF RECORD: PLEASE TAKE NOTICE** that on April 26, 2019, at 9:30 a.m., or  
22 as soon thereafter as may be heard before the Honorable Maame Ewusi-Mensah Frimpong  
23

24 **District Judge**

25 **United States Courthouse, 350 West First Street, Los Angeles, CA, 90012, Courtroom 8B, 8th**  
26 **Floor**  
27  
28

1 of the United States District Court for the Southern District of California, Western Division  
2 Los Angeles will and hereby do move this Court for an order disqualifying Quinn Emanuel  
3 Urquhart & Sullivan, LLP (“Quinn Emanuel”), from representing Michael Lewis Goguen,  
4 Sequoia Capital, Two Bear Capital, Any and all companies owned By Michael Lewis Goguen ad  
5 Sequoia Capital, They must not be allowed to represent any defendant in the instant case as  
6 they have a self serving reason to do so in furtherance of obstruction of justice The must be  
7 barred from repressing , Inc. (“SCI”), in this action. Uber respectfully requests that the Court  
8 disqualify Quinn Emanuel lawyers from representing QUINN EMANUEL URQUHART &  
9 SULLIVAN LLP . They have a monopoly on the legal profession and act at all times in regards too  
10 Plaintiff Amber Doe with SUPREME and Absolute Malice. These criminal Quinn Emanuel lawyers  
11 must forever be barred from interfering on any way with Amber Doe’s medical treatment.  
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19 **Quinn Emanuel’s Representation Of Michael Lewis Goguen His companies, QUINN**  
20 **EMANUEL URQUHART & SULLIVAN LLP their relationships and marriages to Judges**  
21 **Their monopoly of the legal field their vested interest in the outcome of the case as they are**  
22 **both defendants and witnesses in the instant case all of their violations of the law over the**  
23 **course of the last 9 years in multiples states countries costs and jurisdictions relating to the**  
24 **Matter Compels Their Disqualification.**

25 **Quinn Emanuel lawyers were deeply involved in every aspect of the litigation matters They are**  
26 **guilty on all counts and allegations set forth in the complaint in the instant case. The Conflict**  
27 **Of Interest Of Certain Attorneys At Quinn Emanuel Is Imputed Directly To The Entire Firm.**  
28 **No Discretionary Or Equitable Reason Weighs Against Disqualifying Quinn Emanuel.**

#### **Rules California Rule of Professional Conduct**

LEGAL STANDARD “The right to disqualify counsel is a discretionary exercise of the trial court’s inherent powers.” *Epikhin v. Game Insight N. Am.*, No. 14-CV-04383-LHK, 2015 WL 2229225, at \*3 (N.D. Cal. May 12, 2015) (citation omitted). Civil Local Rule 11-4(a)(1) mandates that every attorney who appears before this Court “comply with the standards of professional conduct required of members of the State Bar of California.” Accordingly, this Court looks to California law to determine whether counsel should be disqualified. *Sunbeam Prods. Inc. v. Oliso, Inc.*, No. C 13-03577 SI, 2014 WL 892918, at \*1 (N.D. Cal. Mar. 4, 2014). Under California law, an attorney owes her client a duty of loyalty and a duty of confidentiality. *Id.* at \*3. While courts are hesitant to interfere with a client’s right to counsel of its choice, the Supreme Court of California has underscored that “[t]he important right to counsel of one’s choice must yield to ethical considerations that affect the fundamental principles of our judicial process” and “[t]he paramount concern must be to preserve public trust in the scrupulous administration of justice and the integrity of the bar.” *Speedee Oil*, 20 Cal. 4th at 1145. “It is beyond dispute [that] a court may disqualify an attorney from representing a client with interests adverse to those of a former client.” *H.F. Ahmanson & Co. v. Salomon Bros., Inc.*, 229 Cal. App. 3d 1445, 1451 (Ct. App. 1991) (citations omitted). “Disqualification in cases of successive representation,” as here, “is based on the prohibition against employment adverse to a former client where, by reason of the representation of the former client, the attorney has obtained confidential information material to the employment.” *Id.* (quotation marks, brackets, and ellipses omitted); see Cal. R. Prof. Conduct 1.9 (“A lawyer who has formerly represented a client in a matter shall not thereafter represent another person in . . . a substantially related matter in which that person’s interests are materially adverse to the interests of the former client . . .”). Disqualification is automatic if the former client does not consent, and “[t]he court does not engage in a ‘balancing of equities’ between the former and current clients.” *H.F. Ahmanson*, 229 Cal. App. 3d at 1451. “The rights and interests of the former client will prevail.” *Id.* “If there is a reasonable probability that confidences were disclosed which could be used against the client in later, adverse representation, a substantial relation between the two cases is presumed,” and disqualification is warranted. *Trone v. Smith*, 621 F.2d 994, 998 (9th Cir. 1980) (emphases added). Of course, actual possession of the former client’s confidential information is sufficient to warrant disqualification, but establishing actual possession is not required because “it is not within the power of the former client to prove what is in the mind of the attorney.” *Id.* at 1453 (quoting *Global Van Lines, Inc. v. Super. Ct. of Orange Cnty.*, 144 Cal. App. 3d 483, 489 (Ct. App. 1983)). Rather, all that is necessary is that “a substantial relationship has been shown to exist between the former representation and the current representation.” *Id.* at 1454 (quoting *Johnson v. Superior Court*, 159 Cal. App. 3d 573, 578 (Ct. App. 1984)). Whether the facts or legal questions are similar depend on whether they are “material.” *Jessen v. Hartford Cas. Ins. Co.*, 111 Cal App. 4th Case 3:18-cv-07440-JCS

Document 30 Filed 02/15/19 Page 15 of 30 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28

DEFENDANTS’ MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP – CASE NO. 3:18-CV-07440-JCS Gibson, Dunn & Crutcher LLP 698, 713 (Ct. App. 2003). For information to be material, “it must be found to be directly at issue in, or have some critical importance to, the second representation.” *Farris v. Fireman’s Fund Ins. Co.*, 119 Cal. App. 4th 671, 680 (Ct. App. 2004) (emphasis added). The presumption

1 that an attorney has access to privileged and confidential matters relevant to a subsequent  
2 representation extends the attorney's disqualification vicariously to the attorney's entire firm.  
3 Speedee Oil, 20 Cal. 4th at 1146; see also Trone, 621 F.2d at 999 ("Once the attorney is found to  
4 be disqualified, both the attorney and the attorney's firm are disqualified from suing the  
5 former client."); Employers Ins. of Wausau v. Albert D. Seeno Const. Co., 692 F. Supp. 1150,  
6 1164 (N.D. Cal. 1988) ("[B]ecause as a rule an attorney is presumed to have the same knowledge  
7 and ethical relationships as all the other attorneys in his firm, if one attorney in a firm is  
8 disqualified from a representation, all the attorneys in the firm are."); Flatt, 9 Cal. 4th at 283  
9 ("If a substantial relationship is established, the discussion should ordinarily end. The rights  
10 and interest of the former client will prevail. Conflict would be presumed; disqualification will  
11 be ordered.") (citation omitted).

### 12 Argument

13 There are no facts to dispute Quinn Emanuel is guilty on all counts in the complaint their are  
14 guilty of Obstruction of Justice criminal mis conduct and must Be disqualified from  
15 representing any party in the Instant case so that Amber Doe can have a fair trial and attempt  
16 to gain her freedom and save her life.

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**CONCLUSION**

**Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), Must be disqualified from the instant case as they are Guilty on all counts as evidenced in the court records in all cases where Plaintiff Amber Doe is either a Plaintiff or Defendant. In the Name of Justice they must be Disqualified From representing any defendant in the instant case.**

Dated May 18,2023

*Amber Doe*

Amber Doe

**DECLARATION OF Amber Doe**

I, Amber Doe declare as follows:

1. I am a party to this action and am over the age of 18 years. I have personal firsthand knowledge of the facts set forth herein and if called as a witness could and would testify competently to the truth of the facts set forth herein.

2. I make this declaration in support of my objection to the Hon. Steve Kim presiding at any further proceedings in this action.

3. QUINN EMANUEL URQUHART & SULLIVAN LLP is disqualified to representing Michael Lewis Goguen His Companies, the witnesses in the instant case or representing QUINN EMANUEL URQUHART & SULLIVAN LLP THE “Lawyers” or former lawyers of the firm from proceedings in this action on the grounds that: This case was filed March 28th 2023. for human trafficking, rape, premises liabilities and 241 additional causes of action and violations of the law

I have declared under penalty of perjury that I can not afford to pay for filing fees in the instant case or the the filing fees in the several other cases where my situation of human trafficking is being

1 explored for profit by dozens if not hundreds of lawyers from the largest law firms in the unites  
2 states. 50 days after the filing of the fee waiver it still has not been granted by Hon. Steve Kim.  
3 Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful  
4 defendants has no law degree and is in dire need of medical treatment which has been removed from  
5 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
6 denied Legal Aid And public Counsel.  
7

8 In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His  
9 lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and  
10 refused to serve a single pleading or notice to Amber Doe although she makes several demands for  
11 service of the pleadings per week.  
12

13 Amber Has today the Court that she is not Being served legal pleadings discovery motions or  
14 anything related to at least tree cases where she is either the plaintiff or defendant.  
15

16  
17 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the  
18 Lawyers in this case since Feb 2014. It is Now May 2023.  
19

20  
21 Amber Does not know how the Lawyers from Quinn Emanuel are obtaining Signatures From Hon.  
22 Steve Kim on the motions they file as she can not see any hearing date nor can she see any Nor can  
23 she see underrated pleadings because they are not on pacer.  
24

25  
26 Plaintiffs motion for Defendants Judgement Should be granted not Delayed as the law is clear  
27 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint  
28



1 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim  
2 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
3 humanity.  
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6 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
7 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
8 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
9 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
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14 never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
15 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
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22 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or  
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12 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
13 Judgement heard Before the Judge. Again If defendant Michael Lewis Goguen and His lawyers did  
14 not force amber Doe to fire her lawyer and subsequently bribe and conspire with her former lawyers  
15 plaintiff would not be requesting a hearing time from the deputy clerk.  
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21 4. A true and correct copy of the court record is available on pacer and in the courts system  
22 Amber has suffered Greatly at the abuse of process by MOTION TO DISQUALIFY QUINN  
23 EMANUEL URQUHART & SULLIVAN LLP. In order For Amber Doe to Have for Access to the  
24 legal Systems MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP  
25 Must be disqualified from the instant case. They are Defendants involved in the malicious conspiracy  
26 they are married to Judges and other lawyers and they have acting with SUPREME AND  
27  
28

1 ABSOLUTE MALICE. They are Participants in the malicious conspiracy and Have Dehumanized  
2 Amber Doe in every possible way so that they can Profit from her circumstances of Slavery, Rape  
3 Abuse, Mutilation see the 244 causes of action and Violations of the law.  
4

5  
6 5. Quinn Emanuel are still obstructing Justice when they know they are guilty of Legal  
7 Mis conduct conspiracy stalking and many of the 244 Causes of action and Violations of the law in  
8 the instant case.  
9

10 On or Before the 5th business day had passed after my fee waiver was enter with the court and Hon.  
11 Steve Kim Failed to sign it. I Then diligently explained my circumstances and position in my  
12 response to the order to Show Cause in less than 10 pages. An additional 20 days later my fee  
13 wavier has still not been signed in an attempt o stymie my ability to serve international defendants in  
14 the case.  
15

16 No Denial of my request for fee waiver has been entered by the court thus preventing plaintiff from  
17 refiling her case and being appointed new Judge in the Federal court that will not prejudice and  
18 stigmatize plaintiff and allow the defendant and his army of lawyers to continue to obstruct the civil  
19 and criminal judicial process. This disqualification must take place in the name of fair access to the  
20 courts by all and to prevent\_ further violations of my human rights, constitutional rights and civil  
21 rights. I and am presenting this verified statement at the earliest possible opportunity.  
22  
23

24 6. **The Court record speaks for itself**

25 **MOTION TO DISQUALIFY QUINN EMANUEL URQUHART & SULLIVAN LLP** knows or  
26 reasonably should known that the list of defendants included defendants in international countries and  
27 hundreds of defendants in the United States and Canada so there is no possible way for the instant  
28

1 case to be a secret and have some how had the instant case sealed with no reason to do so as all  
2 defendants and plaintiffs have the right to read review and cross-examine the defendants and  
3 plaintiffs on the evidence. Defendants Michael Lewis Goguens requests for the Judges and the  
4 government to cover up his sex trafficking conspiracy are an obstruction of justice and a slap in the  
5 face to his victims of which there are a great many. Quinn And Emanuel Must be disqualified from  
6 the instant case so that Plaintiff can proceed to trial have a fair trial and become a free persona who  
7 has food shelter medical care and sis no longer trafficked by anyone.  
8  
9

10 I declare under penalty of perjury under the laws of the State of California that the foregoing  
11 is true and correct and that this declaration is executed on May 18, 2023 at Los Angeles, California.  
12

13 I, Amber Doe declare that:

14 I am a party to this action.

15 My testimony and all attachments and contents thereof. I declare that the same is true of my  
16 own knowledge, except as to those matters which are therein stated upon my information and belief,  
17 and to those matters I believe them to be true.  
18

19 I declare under penalty of perjury under the laws of the State of California, that the foregoing  
20 is true and correct.  
21

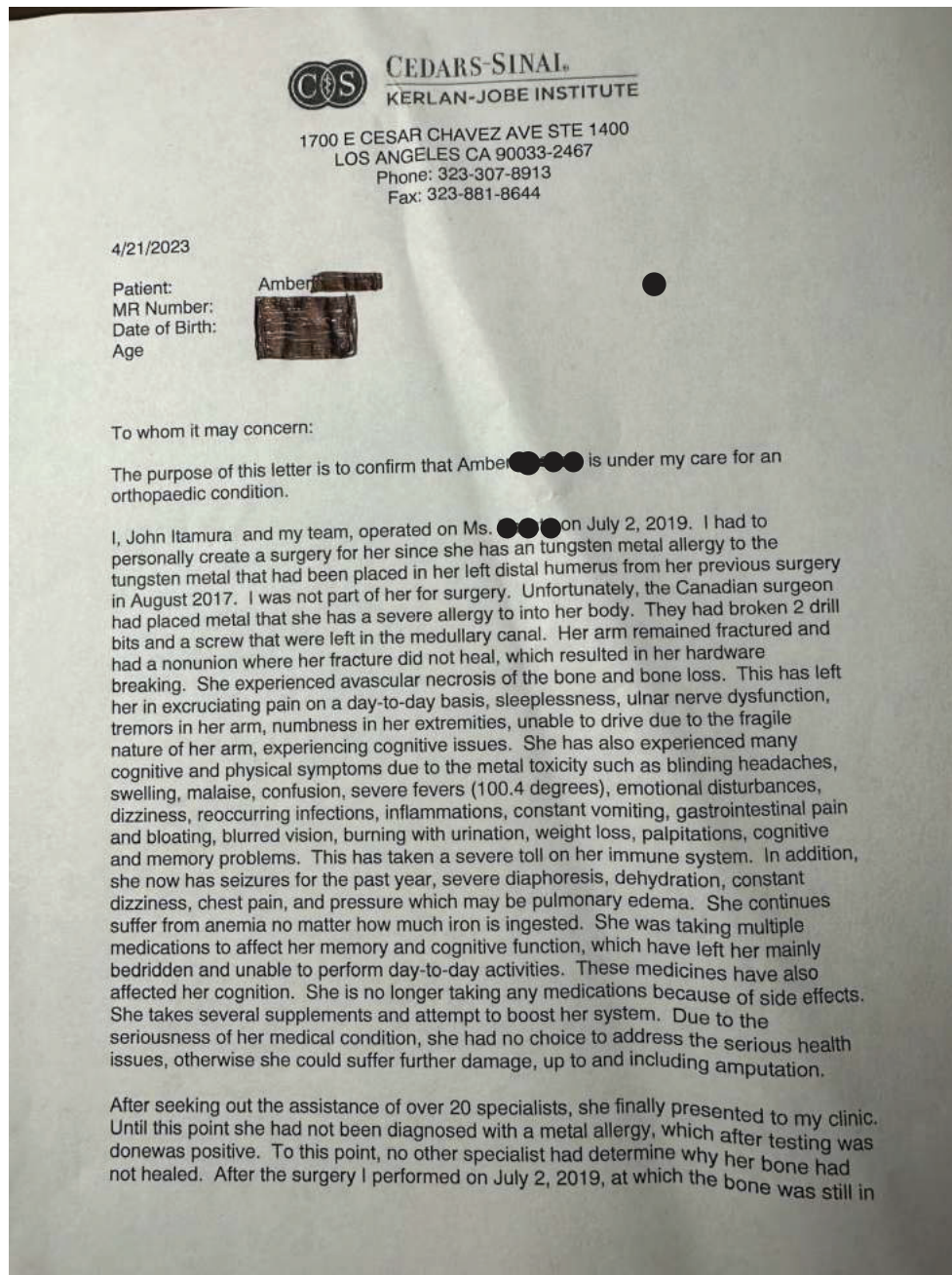
22 Executed this 18th day of May, 2023, at Los Angeles , California.

23 *Amber Doe*

24 Amber Doe  
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# Exhibit 1







CEDARS-SINAL  
KERLAN-JOBE INSTITUTE

the state of complete nonunion, after she was told more than 18 months prior that the bone was healed. She has presented at my office in multiple occasions for follow-up.

I advised her to be on bedrest due to the high risk of potential infection. The operative note has been attached which shows its complexity. The surgery included a bone marrow aspirate from her hip to help the fracture heal. This case is one of the most complex cases I have treated. She had a nonunion for almost 2 years prior to arriving to my clinic in which she had injured the pain from her initial injury and unsuccessful surgery. After the surgery, Ms. Bastiste suffered complications. She sustained an almost 2-week long fever which was treated with antibiotics prescribed by me. As of April 2023 she is experiencing fevers that continues for several days or weeks. The symptoms at this time are almost constant.

She is still experiencing the effects of metal toxicity due to the screws remaining that were unable to be extracted without splitting her distal humerus in half. The damage in her left arm is permanent and the damage from the metal toxicity is as well. She is still in the process of resolving the issues of the metal toxicity under direct guidance from her medical doctors. Ms. Bastiste is being denied health insurance based on her pre-existing conditions two of them being her arm injuries and metallosis. She has to pay cash only for her medical care which limits her access to healthcare since many facilities do not accept cash only patients. In the dozens of surgeons she has met with and being referred to, myself and my team are the only team willing to perform this high risk surgery and try to prevent further damage to her health and possible death. It is extremely rare that any surgeon would leave tungsten drill bits in the patient and not disclose it, removed the surgical record and subsequently state the bone was healed, and send the patient to physical therapy knowing the bone has not healed, deny patient a CAT scan, and state that tungsten is no different than stainless steel.

She is very ill and needs surgery as soon as possible. My team is prepared to operate. I do not advise that it is acceptable that the same surgeon who caused profound damage with operating her again even if supervised.

There is very little research on the effects of tungsten; however, we have attached some research from the UK for your review.

I can be contacted in my office in Los Angeles.

I, John Itamura, MD, and a graduate of USC school of medicine, Los Angeles County plus USC Medical Center internship and residency orthopedic surgery, WB Carol Memorial clinic fellowship in shoulder and elbow surgery, and Massachusetts General Hospital fellowship in hand and upper extremity AO international. I have been in practice for 28 years specializing in shoulder and elbow orthopedic surgery. I am the director of Kerlan-Jobe adult shoulder and elbow reconstruction fellowship.

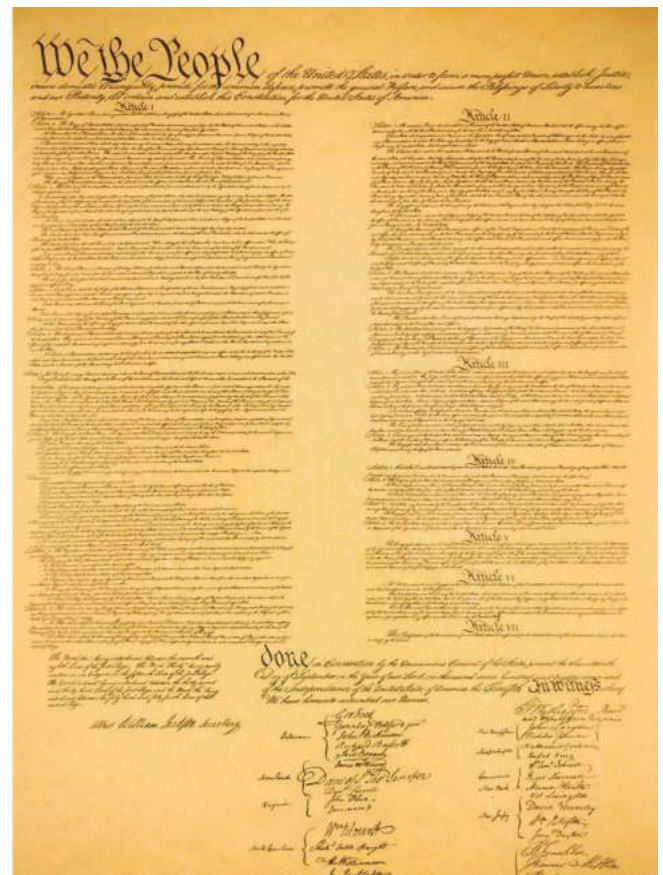
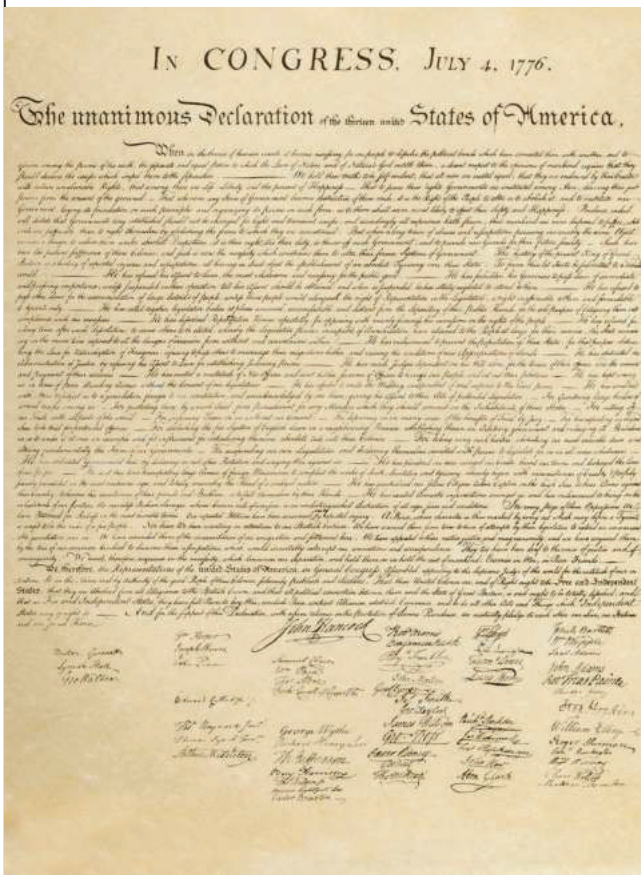
Sincerely,

John Minoru Itamura, MD

## Exhibit 2

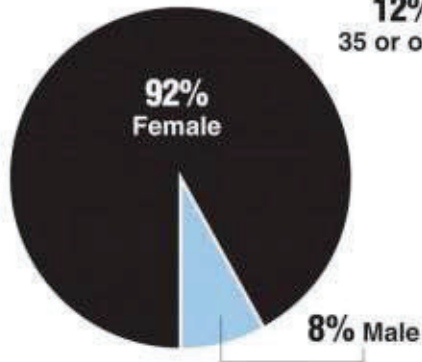




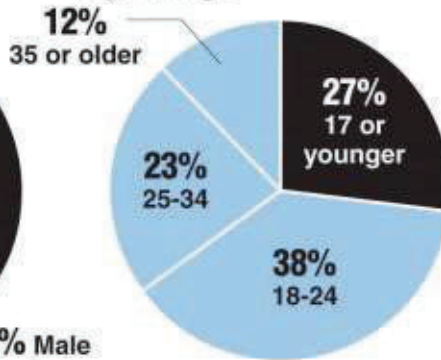


# Who are the victims of human trafficking?

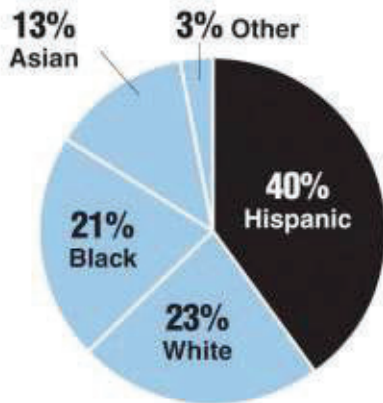
## Gender



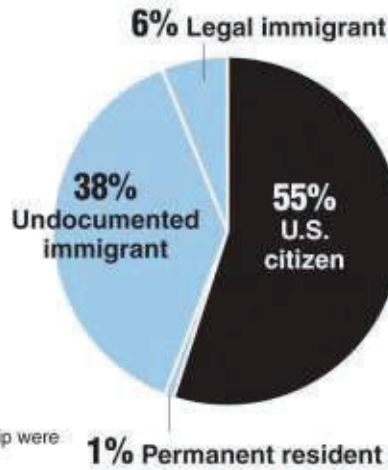
## Age range



## Ethnic origins



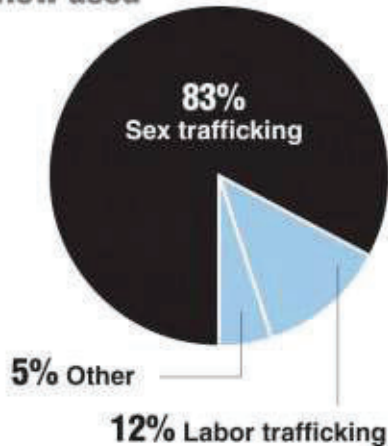
## Citizenship



NOTE: Data for age, ethnic origins and citizenship were not reported for about half the reported victims

## The work of slavery

### How used



### Sex trafficking

#### Forced prostitution



#### Child sex trafficking



#### Other



© 2009 MCT

Source: Characteristics of Suspected Human Trafficking Incidents, 2007-08, U.S. Bureau of Justice Statistics, January 2009  
 Graphic: Dave Eames and Mark Morris, The Kansas City Star

Charts showing the victims of human trafficking in the U.S., by gender, age, ethnic origin; includes information on how victims are used. (Graphic Credit: MCT Campus, The Kansas City Star, 2009)

Lauren J. Mapp, Editor-in-Chief

November 5, 2012

Marie (not her real name) was a 15-year-old girl like many others – she was a soccer player who worked hard in her classes and had dreams of going to college to become a nurse. Unlike many students, though, she had a secret.

At home Marie’s stepfather abused her on a regular basis, and after several years of sexual and physical trauma she became too afraid to stand up to him. Her solution was to run away from her family’s home in Eastlake.

“I couldn’t tell my mother because I knew it was gonna break her heart, and I was embarrassed to talk to anyone at school about it,” Marie said. “I got up and left and thought that I’d finally be safe.”

Instead of the safety she thought she was running away to, Marie instead found herself alone and hungry on the streets in downtown San Diego, wondering where she would turn next. When Bruce (also a pseudonym) asked her out to dinner, offering to pay, she gladly accepted. She and the 32-year-old immediately started dating, but within a few short weeks he revealed his plan to her for how they could make some quick cash: prostitution.

Having no other options, she reluctantly decided to go along with his idea, but Marie soon realized that the emotional turmoil would be more than she could bear.

“The first time was the hardest,” Marie said. “I kept thinking that it was wrong. This man was dirty, sweating, groping me, focused on getting laid and nothing else. I went back to Bruce’s apartment and cried myself

1 to sleep, saying I wouldn't do it again, but the next night I was back on  
2 the street."

3 America's Finest City is the eighth most prominent U.S. metro area for  
4 sex trafficking, according to the FBI (Los Angeles and San Francisco are  
5 also in the top 13). It is estimated that as many as 2,500 teenage  
6 runaways are in San Diego at any given time, and that most runaway  
7 children are approached for sex within 48 hours of being on their own,  
8 according to Generate Hope's Director of Development Holly Hepburn.  
9 Since 2010, Generate Hope – a San Diego non-profit organization – has  
10 been working with women ages 18 to 35 who are victims of sex  
11 trafficking, helping them break free from trafficking and reestablish  
12 themselves in mainstream society. Although Generate Hope helps  
13 victims from all areas, the majority are from San Diego County.  
14 "It's very much happening in our cities and in our schools," Hepburn  
15 said about sex trafficking-related crimes.

16 Eric Drilling, a vice detective in the San Diego Police Department, said  
17 the average age for entering into prostitution is 12 to 13. He said that  
18 most local victims of sex trafficking are from the San Diego area.  
19 Drilling said people might see girls working on streets known for  
20 prostitutes, such as El Cajon Boulevard, and think they are there freely,  
21 but that this is often a misconception.

22 "A vast majority of these girls have pimps, and it may appear that  
23 they're willing to do this, but there's a lot of psychological coercion that  
24 goes into pimping," Drilling said.

25 The Californians Against Sexual Exploitation Act, also known as  
26 Proposition 35, is an initiative to fight sex trafficking in California, will  
27 be on the ballot Tuesday. If passed, the so-called CASE Act would  
28 increase Megan's Law protections against online predators, increase  
prison terms for those convicted of sex trafficking and require that law  
enforcement agents have sufficient training on human trafficking.



1 The CASE Act would also create fines for convicted criminals. Funds  
2 raised from the fines would be used in services to help sex trafficking  
3 victims.

4 “I think it’s a good starting point because you’ve got to start  
5 somewhere,” Hepburn said about the CASE Act. “It’s a tough subject  
6 [and] it’s going to be tough to get [the law] passed. People are just  
7 starting to learn about it.”

8 Drilling believes changes in the law such as Prop 35 and increased  
9 funding for law enforcement are key to fighting sex trafficking.

10 “I’m a cop. I’m always going to advocate for more money,” he said.

11 “We could double the size of this [vice] unit, and it just means that many  
12 more girls off the street and that many more pimps in jail. Sentencing is  
13 something that certainly assists us with the goal of locking away people  
14 that engage in this activity.”

15 Marie finally got away from Bruce and selling her body, yet many more  
16 victims of sex trafficking remain in San Diego. Today, Marie has  
17 escaped from both the trauma of her abusive upbringing and the abusive  
18 lifestyle of working for Bruce, but many children are still trapped within  
19 abusive relationships

20 “I wish that there were options for me when I was being abused by my  
21 stepdad,” Marie said. “Other kids [shouldn’t have to] sell their bodies  
22 like I did at that age, and I hope that things change so girls can escape  
23 from [sex] trafficking easier.”  
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1  
2 Trafficking victims are deceived by false promises of  
3 love, a good job, or a stable life and are lured or forced  
4 into situations where they are made to work under  
5 deplorable conditions with little or no pay. In the United  
6 States, trafficking victims can be American or foreign  
7 citizens. Sep 28, 2022

**PROOF OF SERVICE**

I am over the age of 18 and not a party to this action.

I am a resident of or employed in the county where the mailing occurred; my business/  
residence address is: FORCED HOMELESSNESS. NO FIXED ABODE  
EMAIL SERVICE ONLY.

On Thursday MAY 18, 2023 I served the foregoing document(s) described as: Motion to  
Disqualify Quinn Emanuel, Declaration of Amber Doe And Exhibits to the following parties:

Main Defendants Quinn Emanuel, Michael Lewis Goguen, Goodwin Procter, Wilson Sonsini  
Goodrich and Rosati, Sequoia Capital, Two Bear Capital, Glaser Weil, Nemecek and Cole, Bisnar  
Chase, Richard Sherman, Gregory Brown,

**NAME AND ADDRESS OF ATTORNEY OR DEFENDANT WITHOUT AN ATTORNEY**

☐ (By U.S. Mail) I deposited such envelope in the mail at \_\_\_\_\_, California  
with postage thereon fully prepaid. I am readily familiar with the firm's  
practice of collection and processing correspondence for mailing. Under the  
practice it would be deposited with the U.S. Postal Service on that same day  
with postage thereon fully prepaid at \_\_\_\_\_, California in the ordinary  
course of business. I am aware that on motion of the party served, service is  
presumed invalid if postal cancellation date or postage meter date is more than  
one day after date of deposit for mailing in affidavit.

☒ (By Email Service to verified email addresses) I caused such email to be  
sent via the internet.

☐ (By Facsimile) I served a true and correct copy by facsimile during regular  
business hours to the number(s) listed above. Said transmission was reported  
complete and without error.

I declare under penalty of perjury under the laws of the United States of America that the  
foregoing is true and correct.

DATED: May 18, 2023

*Amber Doe*  
Amber Doe

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Amber Doe  
P.O. Box 20  
8306 Wilshire Blvd.  
Los Angeles, CA 90211  
Phone 424- 379- 3619  
[amberlitigate@gmail.com](mailto:amberlitigate@gmail.com)  
Propia Persona

UNITED STATES DISTRICT COURT  
DISTRICT OF  
Los Angeles  
For removal to The Supreme Court of the United States  
Writ of Certiorari In Preparation

Amber Doe,	)	Case No. CV23-2280-MEMF(SK)
	)	
Plaintiff,	)	
	)	
vs.	)	<b>STATEMENT IN SUPPORT OF OBJECTION TO</b>
	)	<b>JUDGE Steve Kim; DECLARATION OF</b>
Michael Lewis Goguen, Sequoia Capital, Two	)	<b>Amber Doe; EXHIBITS, Court Record,</b>
	)	<b>MEMORANDUM OF POINTS AND</b>
Bear Capital, Quinn Emanuel, Wilson, Sonsini,	)	<b>AUTHORITIES</b>
	)	
Goodrich& Rosati, Goodwin Procter, The United	)	<b>DEPT: 8B</b>
	)	<b>JUDGE: CV23-2280-MEMF(SK)</b>
States of America, Cristopher Reynolds, Galser	)	
	)	
Weil, Bisnar Chase, Nemeck and Cole, San	)	
	)	
Mateo Court Orange County Court, Oranch	)	
	)	
Couty, San Mateo County, See Interested parties	)	

**Be sure to remove these notices before using this document.**  
TO THE CLERK OF THIS COURT AND ALL OTHER INTERESTED PARTIES AND  
THEIR ATTORNEYS OF RECORD:  
  
PLEASE TAKE NOTICE that **CAPACITY OF PARTY SUCH AS PLAINTIFF,**

1 Amber Doe HEREBY OBJECTS to the Hon. **NAME OF JUDGE TO WHICH OBJECTION IS**  
2 **MADE Judge Steve Kim** presiding at any further hearings or proceedings concerning this action.  
3  
4 Said objection is based on the grounds and upon the facts set forth in the declaration of Amber Doe  
5 and exhibits attached thereto, concurrently filed and served herewith and incorporated herein by  
6 reference.

7 Dated May 18, 2023

Amber Doe  
*Amber Doe*

**DECLARATION OF Amber Doe**

I, Amber Doe declare as follows:

1. I am a party to this action and am over the age of 18 years. I have personal firsthand knowledge of the facts set forth herein and if called as a witness could and would testify competently to the truth of the facts set forth herein.

2. I make this declaration in support of my objection to the Hon. Steve Kim presiding at any further proceedings in this action.

3. The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the grounds that: This case was filed March 28th 2023. Within 5 days of the date of filing the complaint for human trafficking rape premises liabilities and 241 additional causes of action and violations of the law The fee waiver should have been granted as I have declared under penalty of perjury that I can not afford to pay for filing fees in the instant case or the the filing fees in the several other cases where my situation of human trafficking is being explored for profit by dozens if not hundreds of lawyers from the largest law firms in the unites states. 50 days after the filing of the fee waiver it still has not been granted by Hon. Steve Kim.

Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful defendants has no law degree and is in dire need of medical treatment which has been removed from her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is denied Legal Aid And public Counsel.

In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and

1 refused to serve a single pleading or notice to Amber Doe although she makes several demands for  
2 service of the pleadings per week.

3 Amber Has today the Court that she is not Being served legal pleadings discovery motions or  
4 anything related to at least tree cases where she is either the plaintiff or defendant.  
5

6  
7 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the  
8 Lawyers in this case since Feb 2014. It is Now May 2023.  
9

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11 Amber Does not know how the Lawyers from Quinn Emanuel are obtaining Signatures From Hon.  
12 Steve Kim on the motions they file as she can not see any hearing date nor can she see any Nor can  
13 she see underrated pleadings because they are not on pacer.  
14

15  
16 Plaintiffs motion for Defendants Judgement Should be granted not Delayed as the law is clear  
17 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint  
18 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim  
19 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
20 humanity.  
21

22  
23  
24 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
25 entire constitution of the Untied States of America would be come invalid if this abuse of process  
26 continues. The Constitution extends to all humans not only the rich and the guilty and for those who  
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1 the court feels deserve a trial by Jury. All humans are equal in the eyes of the law whether they are  
2 slaves or not.

3  
4  
5 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form of  
6 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has  
7 never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
8 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
9 it was procured through fraudulent inducement of a judge and bribery Such gag order was signed first  
10 by Hon. Danny Chao after he was bribed. The Second Order signed By Hon. Elizabeth Lee after  
11 Quinn Emanuel Lawyers again acted with Malice and Served plaintiff only the pleadings they felt  
12 like serving plaintiff and intentionally obstructed the Judicial process by Suddenly changing the date  
13 of the hearing and in addition providing Plaintiff with a fake Hearing time of 1:00 pm when they  
14 knew the hearing was set for 9:00 am and they did not provide payoff of the court room nor the  
15 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or  
16 defend herself.  
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21 The Court Denied Amber Does request for E-filing for no reason. It is mandatory for the lawyers to  
22 utilize e-filing. Plaintiff has expressed that she is homeless without medical treatment and this will  
23 cause her a pre-mature death. She has no money to pay for shipping fees for filings she has no money  
24 for paper and printing services. E-filing is extended to mostly everyone else and is better for the  
25 environment. The request for exiling should have been granted.  
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1 The court exerts that Plaintiff made Ex-parte Communications to the Court which lawyers and  
2 People without lawyers are allowed and instructed to email the clerk and the clerks email them in  
3 response. Plaintiff never spoke to the Judge nor did she bribe the judge she followed the instructed  
4 protocol. The Clerks in the office instructed Amber Doe to email the Clerk and speak to the Deputy  
5 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
6 Judgement heard Before the Judge. Again If defendant Michael Lewis Goguen and His lawyers did  
7 not force amber Doe to fire her lawyer and subsequently bribe and conspire with her former lawyers  
8 plaintiff would not be requesting a hearing time from the deputy clerk.  
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14 4. A person aware of the facts might reasonably entertain a doubt that the judge would be  
15 able to be impartial in that only 50 days after the filing of this complaint which includes California  
16 State Judges that Violated plaintiffs Civil rights while acting under the color of the law Hon. Steve  
17 Kim has shown the same prejudice to Amber Doe. A true and correct copy of the court record is  
18 available on pacer and in the courts system  
19  
20

21 5. I first became aware of the grounds for disqualification of judge when the 5th business  
22 day had passed after my fee waiver was enter with the court and Hon. Steve Kim Failed to sign it. I  
23 Then diligently explained my circumstances and position in my response to the order to Show Cause  
24 in less than 10 pages. An additional 20 days later my fee wavier has still not been signed in an  
25 attempt o stymie my ability to serve international defendants in the case.  
26  
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1 No Denial of my request for fee waiver has been entered by the court thus preventing plaintiff from  
2 refiling her case and being appointed new Judge in the Federal court that will not prejudice and  
3 stigmatize plaintiff and allow the defendant and his army of lawyers to continue to obstruct the civil  
4 and criminal judicial process. This disqualification must take place in the name of fair access to the  
5 courts by all and to prevent further violations of my human rights, constitutional rights and civil  
6 rights. I and am presenting this verified statement at the earliest possible opportunity.  
7

8  
9 **6. The Court record speaks for itself**

10 7. In this case, Judge Steve Kim exceeded the bounds of reasonable conduct for a  
11 judge seeking to exercise control of the proceedings and reach an unfair and efficient result.

12 8. The behavior of Judge Steve Kim involved conduct that clearly did not afford me a  
13 reasonable opportunity to be heard and present my evidence. The obligation of a judge to dispose of  
14 matters promptly and efficiently must not take precedence over the judge's obligation to dispose of  
15 the matters fairly and with patience. For example the Canons of Judicial Ethics state in pertinent part  
16 that, when a litigant is self-represented, a judge has the discretion to take reasonable steps,  
17 appropriate under the circumstances and consistent with the law and the canons, to enable the litigant  
18 to be heard. ... *Cannon 3, Advisory Comm. Commentary*, Page 17, Lines 24-30.  
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23 9) Judge Steve Kim knows or reasonably should know that the list of defendants included defendants  
24 in international countries and hundreds of defendants in the united states and Canada so there is no  
25 possible way for the instant case to be a secret and has sealed the case with no reason to do so as all  
26 defendants and plaintiff have the right to read review and cross-examine the defendants and plaintiffs  
27 on the evidence. Defendants Michael Lewis Goguens requests for the Judges and the government to  
28

cover up his sex trafficking conspiracy are an obstruction of justice and a slap in the face to his victims of which there are a great many.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on May 18, 2023 at Los Angeles, California.

I, Amber Doe declare that:

I am a party to this action.

My testimony and all attachments and contents thereof. I declare that the same is true of my own knowledge, except as to those matters which are therein stated upon my information and belief, and to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct.

Executed this 18th day of May, 2023, at Los Angeles , California.

*Amber Doe*

Amber Doe

## MEMORANDUM OF POINTS AND AUTHORITIES

### I.

#### STATEMENT OF FACTS



1 This case is **CIVIL ACTION For Human Trafficking Rape And 242 additional causes of**  
2 **action and Violations of the law by the perpetrator Michael Lewis Goguen his lawyers**  
3 **companies agents “investigators” and all people hired by them.** Quinn Emanuel lawyers have  
4 acted in **SUPREME ABSOLUTE MALICE** and have obstructed justice on behalf of  
5 Micheal Lewis Goguen for over 9 years and Victimized Amber Doe  
6  
7

8  
9 Amber Doe objects to the Hon. Steve Kim presiding at any further hearings or proceedings  
10 concerning this action on the grounds that a person aware of the facts might reasonably entertain a  
11 doubt that the judge would be able to be impartial in that he as already been made aware that  
12 Plaintiffs rights have been violated and that she is not being served the pleadings or times and dates  
13 that QuinnEmanuel who are both witnesses and defendants in the case are going before the judge and  
14 obtaining his signature on legal documents refer to court record.  
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3 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
4 denied Legal Aid as well as public Counsel because she is suing Lawyers who will obstruct justice  
5 and overwhelm their limited resources with hundreds of thousand of legal documents.  
6

7 In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His  
8 lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and  
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**II.**

**ARGUMENT**

**A. CALIFORNIA LAW STATES THAT A JUDGE IS DISQUALIFIED WHERE  
THEY HAVE A FINANCIAL INTEREST IN A PARTY TO THE ACTION OR FOR  
ANY REASON OTHER PERSONS AWARE OF THE FACTS MIGHT REASONABLY  
ENTERTAIN A DOUBT THAT THE JUDGE WOULD BE ABLE TO BE IMPARTIAL AND A  
JUDGE’S BIAS TOWARDS A PARTY IS CLEARLY A GROUND FOR  
DISQUALIFICATION**

California law states that a judge is disqualified where, for any reason:

1 “The judge has a financial interest in the subject matter in a proceeding or in a party to the  
2 proceeding”. See *Code of Civil Procedure* § 170.1(a)(3)(A)

3 “Other persons aware of the facts might reasonably entertain a doubt that the judge would be  
4 able to be impartial”. See *Code of Civil Procedure* § 170.1(a)(6)(A)(iii).

5  
6 *Code of Civil Procedure* §170.5 states in pertinent part that, “For the purposes of Sections 170  
7 to 170.5, inclusive, the following definitions apply:

8 (a) “Judge” means judges of the superior courts, and court commissioners and referees.

9  
10 (b) “Financial interest” means ownership of more than a 1 percent legal or equitable interest  
11 in a party, or a legal or equitable interest in a party of a fair market value in excess of one thousand  
12 five hundred dollars (\$1,500), or a relationship as director, advisor or other active participant in the  
13 affairs of a party, except as follows:

14  
15 The test for impartiality is objective in that “The situation must be viewed through the eyes of  
16 the ... average person on the street” as of the time the motion is brought. *United Farm Workers of*  
17 *America v. Sup.Ct. (Maggio, Inc)*. (1985) 170 Cal. App. 3d 97, 104 (emphasis added).

18  
19 “The word ‘might’ in the statute was intended to indicate that disqualification should follow if  
20 the reasonable man, were he to know all the circumstances, would harbor doubts about the judge's  
21 impartiality.” *United Farm Workers of America v. Sup.Ct. (Maggio, Inc)*., supra, 170 Cal.App. 3d at p.  
22 104 (emphasis added).

23  
24 Judge Steve Kim also exhibited bias towards Amber Doe in that The Hon. Steve Kim is  
25 disqualified to preside at any further proceedings in this action on the grounds that: This case was  
26 filed March 28th 2023. Within 5 days of the date of filing the complaint for human trafficking rape  
27 premises liabilities and 241 additional causes of action and violations of the law The fee waiver  
28

1 should have been granted as I have declared under penalty of perjury that I can not afford to pay for  
2 filing fees in the instant case or the the filing fees in the several other cases where my situation of  
3 human trafficking is being explored for profit by dozens if not hundreds of lawyers from the largest  
4 law firms in the unites states. 50 days after the filing of the fee waiver it still has not been granted by  
5  
6 Hon. Steve Kim.

7 The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the grounds  
8 that: This case was filed March 28th 2023. Within 5 days of the date of filing the complaint for  
9 human trafficking rape premises liabilities and 241 additional causes of action and violations of the  
10 law The fee waiver should have been granted as I have declared under penalty of perjury that I can  
11 not afford to pay for filing fees in the instant case or the the filing fees in the several other cases  
12 where my situation of human trafficking is being explored for profit by dozens if not hundreds of  
13 lawyers from the largest law firms in the unites states. 50 days after the filing of the fee waiver it still  
14 has not been granted by Hon. Steve Kim.

15  
16  
17 Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful  
18 defendants has no law degree and is in dire need of medical treatment which has been removed from  
19 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
20 denied Legal Aid And public Counsel.

21  
22 In further of the abuse of process and obstruction of Justice By Michael Lewis Goguen and His  
23 lawyers Quinn Emanuel They have filed multiple motions and pleading in the instant case and  
24 refused to serve a single pleading or notice to Amber Doe although she makes several demands for  
25 service of the pleadings per week.  
26  
27  
28

1 Amber Has today the Court that she is not Being served legal pleadings discovery motions or  
2 anything related to at least tree cases where she is either the plaintiff or defendant.

3  
4  
5 Amber Doe has the right to proceed to trial expeditiously she has already been victimized by the  
6 Lawyers in this case since Feb 2014. It is Now May 2023.

7  
8  
9 Amber Does not know how the Lawyers from Quinn Emanuel are obtaining Signatures From Hon.  
10 Steve Kim on the motions they file as she can not see any hearing date nor can she see any Nor can  
11 she see underrated pleadings because they are not on pacer.

12  
13  
14 Plaintiffs motion for Defendants Judgement Should be granted not Delayed as the law is clear  
15 Defendants have 30 days to answer the complaint not a single defendant has answered the complaint  
16 nor have their legal representatives contacted plaintiff. It is in evidence that Hon. Steve Kim  
17 Believes that a separate set of laws and rules of the court apply to Amber Doe that the rest of  
18 humanity.  
19

20  
21 Amber Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
22 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
23 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
24 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
25  
26  
27  
28



1 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form of  
2 a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff has  
3 never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
4 raped any person nor has she obstructed justice. The illegally procured restraining order is invalid as  
5 it was procured through fraudulent inducement of a judge and bribery Such gag order was signed first  
6 by Hon. Danny Chao after he was bribed. The Second Order signed By Hon. Elizabeth Lee after  
7 Quinn Emanuel Lawyers again acted with Malice and Served plaintiff only the pleadings they felt  
8 like serving plaintiff and intentionally obstructed the Judicial process by Suddenly changing the date  
9 of the hearing and in addition providing Plaintiff with a fake Hearing time of 1:00 pm when they  
10 knew the hearing was set for 9:00 am and they did not provide playoff of the court room nor the  
11 Zoom information for the hearing. Subsequently Plaintiff could not make any oral arguments or  
12 defend herself.  
13  
14  
15  
16

17 The Court Denied Amber Does request for E-filing for no reason. It is mandatory for the lawyers to  
18 utilize e-filing. Plaintiff has expressed that she is homeless without medical treatment and this will  
19 cause her a pre-mature death. She has no money to pay for shipping fees for filings she has no money  
20 for paper and printing services. E-filing is extended to mostly everyone else and is better for the  
21 environment. The request for exiling should have been granted.  
22  
23  
24

25 The court exerts that Plaintiff made Ex-parte Communications to the Court which lawyers and  
26 People without lawyers are allowed and instructed to email the clerk and the clerks email them in  
27 response. Plaintiff never spoke to the Judge nor did she bribe the judge she followed the instructed  
28

1 protocol. The Clerks in the office instructed Amber Doe to email the Clerk and speak to the Deputy  
2 Clerk about an Ex-parte hearing time and to find a date on the calendar to have “Deficient” Default  
3 Judgement heard Before the Judge. Again If defendant Michael Lewis Goguen and His lawyers did  
4 not force amber Doe to fire her lawyer and subsequently bribe and conspire with her former lawyers  
5 plaintiff would not be requesting a hearing time from the deputy clerk.  
6

7  
8 Bias exists where the judge evidences a “predisposition to decide a cause or an issue in a  
9 certain way, which does not leave the mind perfectly open to conviction.” The judge's bias toward a  
10 party is clearly ground for disqualification. *Pacific & Southwest Annual Conf. of United Methodist*  
11 *Church v. Sup.Ct. (Barr)* (1978) 82 Cal.App. 3d 72, 86.  
12

13  
14 **B. THE STATUTES GOVERNING DISQUALIFICATION FOR CAUSE IN**  
15 **CALIFORNIA ARE INTENDED TO ENSURE PUBLIC CONFIDENCE IN THE**  
16 **JUDICIARY AND TO PROTECT THE RIGHTS OF LITIGANTS TO A FAIR AND**  
17 **IMPARTIAL ADJUDICATOR AND THE UNITED STATES SUPREME COURT HAS**  
18 **STATED THAT A FAIR TRIAL IN A FAIR TRIBUNAL IS A BASIC REQUIREMENT OF**  
19 **DUE PROCESS**  
20

21 The conduct exhibited by Judge Steve Kim showed clear evidence of bias and prejudice and  
22 deprived Amber Doe of their right to a fair and impartial adjudicator. This conduct also deprived him  
23 of his right to a fair trial in a fair tribunal which is a basic requirement of due process as stated by the  
24 United States Supreme Court.  
25  
26  
27  
28

1 The California Supreme Court has stated that the, "Statutes governing disqualification for  
2 cause are intended to ensure public confidence in the judiciary and to protect the right of the litigants  
3 to a fair and impartial adjudicator." *Curle v. Superior Court* (2001) 24 Cal.4th 1057, 1070.

4  
5 The United States Supreme Court has stated that, it is "axiomatic that [a] fair trial in a fair  
6 tribunal is a basic requirement of due process." *Caperton v. A. T. Massey Coal Company*, (2009)  
7 556 U.S. 868, 876. In *Caperton* the Supreme Court also stated that the due process clause of the  
8 federal Constitution (US Const amend XIV) can require judicial disqualification even in cases where  
9 the party requesting disqualification has not complied with any applicable state disqualification  
10 statutes, and that a showing of actual bias is not required for judicial disqualification under the due  
11 process clause.  
12

13  
14 "The Due Process Clause entitles a person to an impartial and disinterested tribunal..."  
15 *Marshall v. Jerrico, Inc.* (1980) 446 U.S. 238, 242; see also *Brown v. American Bicycle Group, LLC*,  
16 (2004) 224 Cal.App.4th 665, 674.

17  
18 The well-established common law rule is that recusal is required when a judge has a direct,  
19 personal, substantial, or pecuniary interest in a case. *Caperton v. A.T. Massey Coal Co.*, supra, 556  
20 U.S. at p. 876-77; see also *Aetna Life Ins. Co. v. Lavoie*, (1986) 475 U.S. 813, 820.

21  
22 Judges have a duty to make their decisions free from any bias or prejudice. *Cal Rules of Ct*,  
23 Standards of J Admin 10.20; Cal Rules of Ct, *Code of Judicial Ethics*, Canon 3B(5).

24  
25 "(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the  
26 performance of judicial duties, engage in speech, gestures, or other conduct that would reasonably be  
27 perceived as (1) bias or prejudice, including but not limited to bias or prejudice based upon race, sex,  
28

gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, or (2) sexual harassment. “

Judge also have a duty to require lawyers in proceedings before them to refrain from manifesting any bias or prejudice. *Code of Judicial Ethics*, Canon 3B(6).

“(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting, by words or conduct, bias or prejudice based upon race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation against parties, witnesses, counsel, or others.”

Judges have a duty to allow every party to a legal proceeding the full right to be heard according to law. *Code of Judicial Ethics*, Canon 3B(7).

“(7) A judge shall accord to every person who has a legal interest in a proceeding, or that person’s lawyer, full right to be heard according to law.”

**C. Amber Doe HAS SHOWN COMPELLING EVIDENCE IN SUPPORT OF THEIR OBJECTION** see court record no filing has been served on Amber Doe by defendants yet they have procured multiple signatures from Hon. Steve Kim on their pleading that they have not served Plaintiff nor have they provided her the signed copies and she has no access to a credit card as Quinn Emanuel tampered with Amber Does banks and demanded they remove her access to all credit products inclusive of credit cards so she has no ability to pay for downloads from Pacer or the Orange County Court website in the court where the Judges are allowing proceedings to move forward against Amber Doe with no regard for the fact that the lawyers are conspiring together to obtain \$ 100 million dollars for no reason while Amber Doe suffers

1 debilitating medical conditions caused by defendants abuse and has no shelter because of  
2 defendants abuse and continues to be stalked by multiple men that she does not know. Amber  
3 Doe has no ability to download more than the limited \$30 per quarter in documents from pacer.  
4 Infurtherance of the aforementioned The Judges/Justices are aware that the illegally procured  
5 “gag order” and the Illegal selling of the case to cover Up the crimes committed against  
6 Plaintiff do not extend to the Courts in Canada, England ,France, Japan, Puerto Rico, The  
7 Virgin Islands, China or any other country where Amber Doe was trafficked and must file cases  
8 against defendants so that she can finally gain her freedom and obtain Medical treatment,  
9 Food, Shelter, Safety and Peace.  
10  
11  
12  
13

14 **THUS DISQUALIFICATION IS REQUIRED IN THE INTERESTS OF JUSTICE**

15 In *DCH Health Servs. Corp. v Waite* (2002) 95 Cal.App. 4th 829, 833 a California Court of  
16 Appeal stated that recusal may be required on the basis of a mere appearance of impropriety.

17 Other cases decided by the California Courts of Appeal have stated that actual bias need not  
18 be present. *Roitz v Coldwell Banker Residential Brokerage Co.*, (1998) 62 Cal.App.4th 716, 723.

19 If an average person could entertain doubt about the judge’s impartiality, disqualification is  
20 mandated. *Catchpole v Brannon* (1995) 36 Cal.App. 4th 237, 246.

21 An appellate court will not speculate about whether the bias was actual or merely apparent;  
22 reversal is required in such a case, with remand of the matter to a different judge for a new hearing on  
23 all issues. *In re Wagner* (2005) 127 Cal.App 4th 138, 147–149; see also *Roitz v Coldwell Banker*  
24 *Residential Brokerage Co.*, supra, 62 Cal.App 4th at p. 723; *Catchpole v Brannon*, supra, 36 Cal.App.  
25 4th at p. 247.  
26  
27  
28

1 One situation in which bias was found involved a judge who interrupted counsel and a litigant  
2 on several occasions. See *Dodds v Commission on Judicial Performance* (1995) 12 Cal.App. 4th 163,  
3 176–177.

4 The numerous instances of bias by Judge Steve Kim toward Amber Doe in this case provide  
5 ample justification for the disqualification of Judge Steve Kim.

6 When the judge has exhibited numerous instances of bias toward a party in the case, such that  
7 the average person might justifiably doubt whether the judge could be impartial, there is ample  
8 justification for disqualifying the judge. *Catchpole v Brannon*, supra, 36 Cal.App. A4th at p. 262.

9 ///

### 10 III.

### 11 CONCLUSION

12 Defendant respectfully requests that Judge Steve Kim be disqualified from presiding over any  
13 further proceedings in this case on the grounds Judge Steve Kim has already been Bias in the instant  
14 case allowed the lawyers to obstruct Justice and this only served to delay the trial and to further  
15 endanger Amber Does life. Just Steve Kim has not yet Heard any oral arguments from Amber Doe  
16 nor has he seen Amber Doe nor heard her Voice yet he is already bias. All facts stated herein would  
17 clearly cause anyone aware of the facts to reasonably entertain a doubt that the judge would be able  
18 to be impartial.

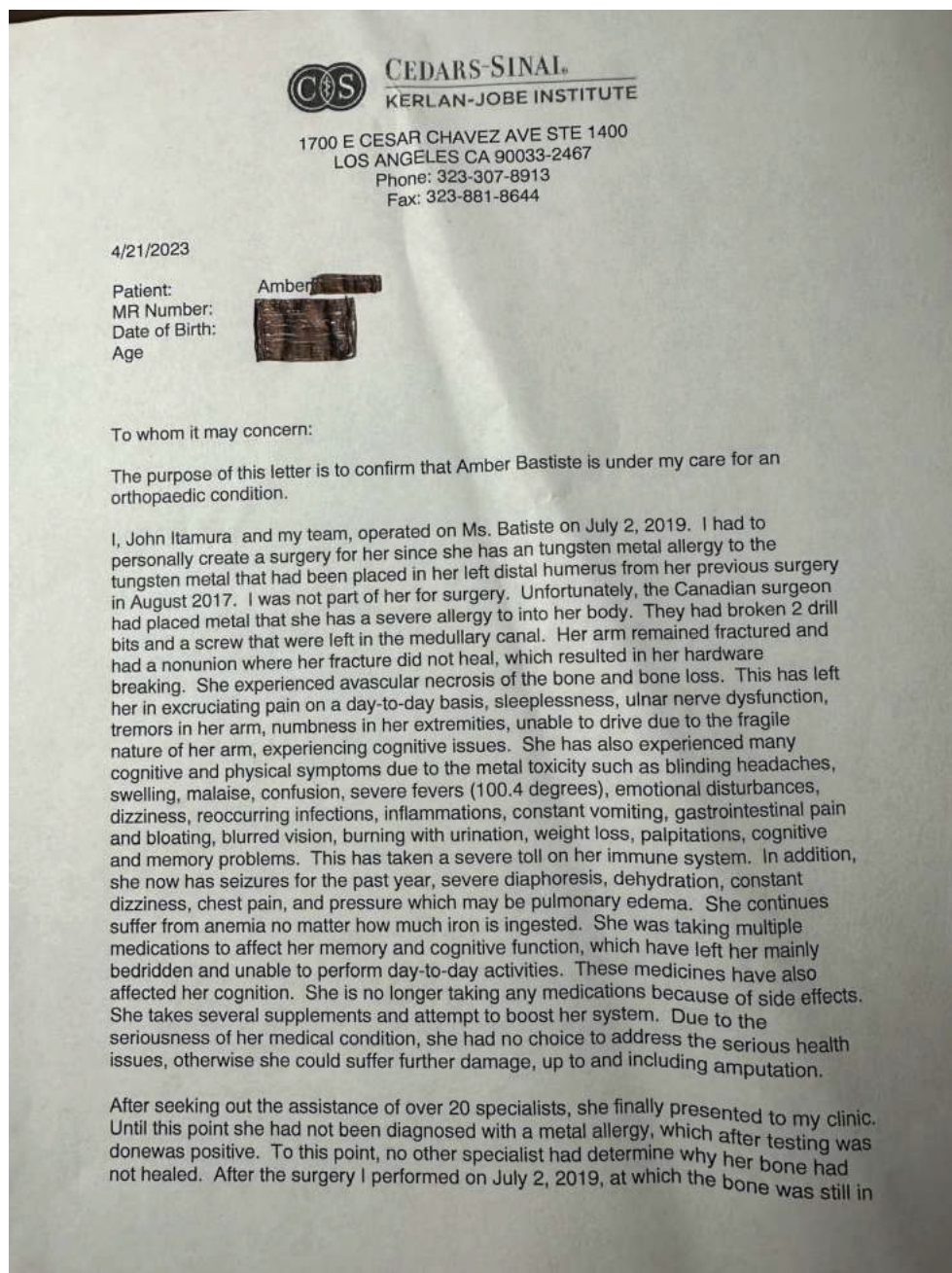
19 Dated May 18,2023

20 *Amber Doe*

21 Amber Doe



# Exhibit 1





CEDARS-SINAL  
KERLAN-JOBE INSTITUTE

the state of complete nonunion, after she was told more than 18 months prior that the bone was healed. She has presented at my office in multiple occasions for follow-up.

I advised her to be on bedrest due to the high risk of potential infection. The operative note has been attached which shows its complexity. The surgery included a bone marrow aspirate from her hip to help the fracture heal. This case is one of the most complex cases I have treated. She had a nonunion for almost 2 years prior to arriving to my clinic in which she had injured the pain from her initial injury and unsuccessful surgery. After the surgery, Ms. Bastiste suffered complications. She sustained an almost 2-week long fever which was treated with antibiotics prescribed by me. As of April 2023 she is experiencing fevers that continues for several days or weeks. The symptoms at this time are almost constant.

She is still experiencing the effects of metal toxicity due to the screws remaining that were unable to be extracted without splitting her distal humerus in half. The damage in her left arm is permanent and the damage from the metal toxicity is as well. She is still in the process of resolving the issues of the metal toxicity under direct guidance from her medical doctors. Ms. Bastiste is being denied health insurance based on her pre-existing conditions two of them being her arm injuries and metallosis. She has to pay cash only for her medical care which limits her access to healthcare since many facilities do not accept cash only patients. In the dozens of surgeons she has met with and being referred to, myself and my team are the only team willing to perform this high risk surgery and try to prevent further damage to her health and possible death. It is extremely rare that any surgeon would leave tungsten drill bits in the patient and not disclose it, removed the surgical record and subsequently state the bone was healed, and send the patient to physical therapy knowing the bone has not healed, deny patient a CAT scan, and state that tungsten is no different than stainless steel.

She is very ill and needs surgery as soon as possible. My team is prepared to operate. I do not advise that it is acceptable that the same surgeon who caused profound damage with operating her again even if supervised.

There is very little research on the effects of tungsten; however, we have attached some research from the UK for your review.

I can be contacted in my office in Los Angeles.

I, John Itamura, MD, and a graduate of USC school of medicine, Los Angeles County plus USC Medical Center internship and residency orthopedic surgery, WB Carol Memorial clinic fellowship in shoulder and elbow surgery, and Massachusetts General Hospital fellowship in hand and upper extremity AO international. I have been in practice for 28 years specializing in shoulder and elbow orthopedic surgery. I am the director of Kerlan-Jobe adult shoulder and elbow reconstruction fellowship.

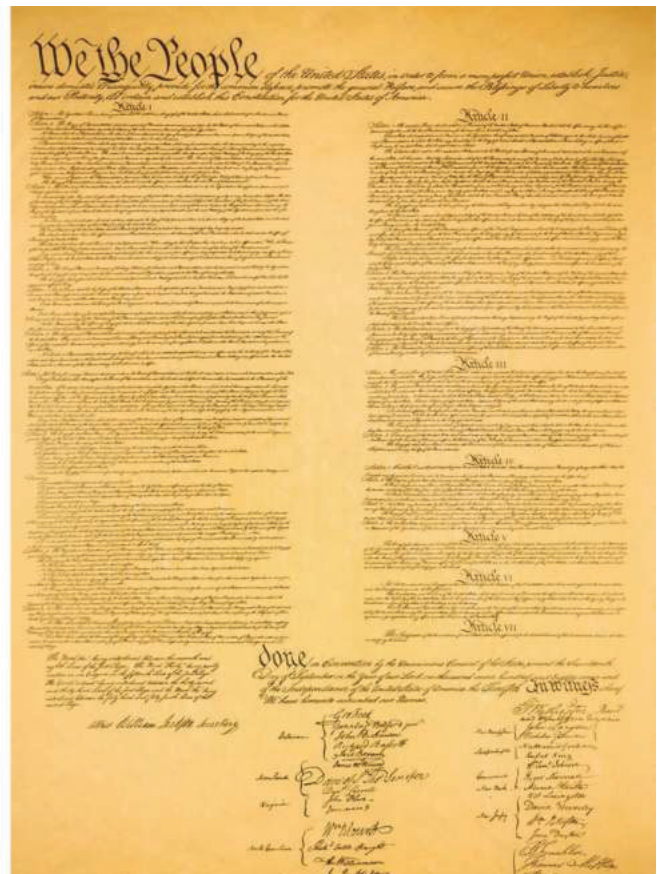
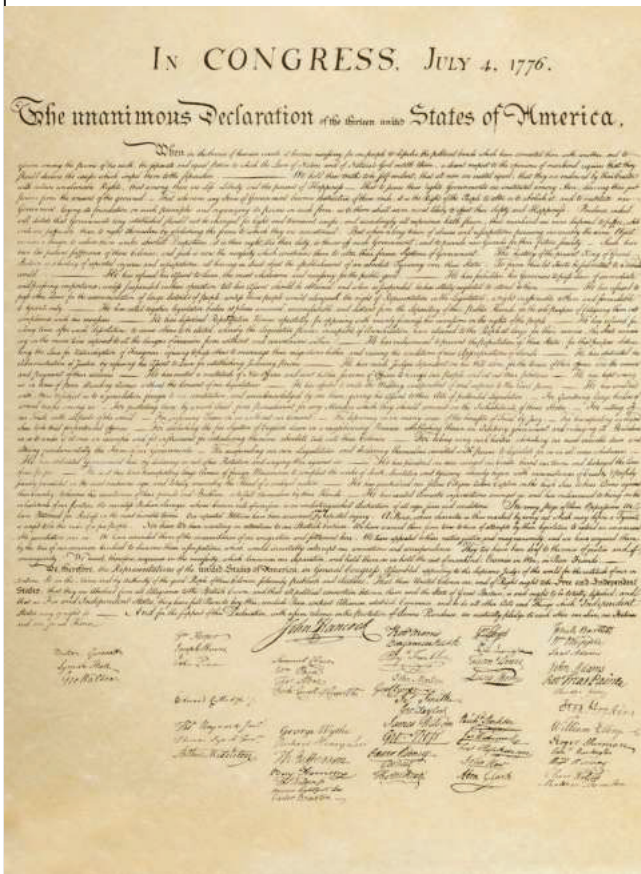
Sincerely,

John Minoru Itamura, MD



## Exhibit 2

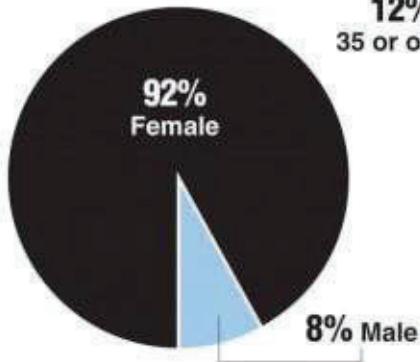




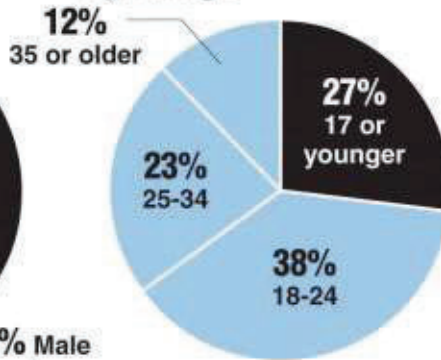
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# Who are the victims of human trafficking?

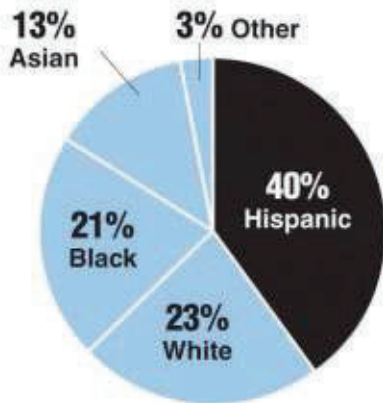
## Gender



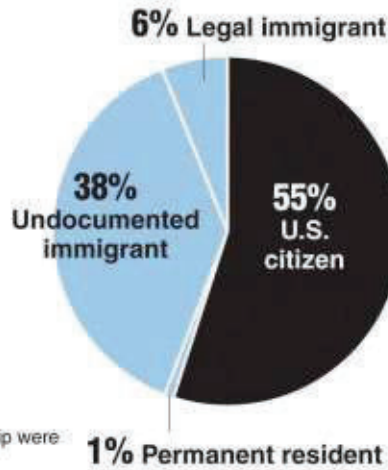
## Age range



## Ethnic origins



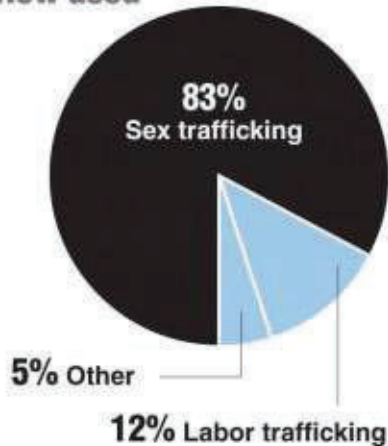
## Citizenship



NOTE: Data for age, ethnic origins and citizenship were not reported for about half the reported victims

## The work of slavery

### How used



### Sex trafficking

#### Forced prostitution



#### Child sex trafficking



#### Other



© 2009 MCT

Source: Characteristics of Suspected Human Trafficking Incidents, 2007-08, U.S. Bureau of Justice Statistics, January 2009  
 Graphic: Dave Eames and Mark Morris, The Kansas City Star

Charts showing the victims of human trafficking in the U.S., by gender, age, ethnic origin; includes information on how victims are used. (Graphic Credit: MCT Campus, The Kansas City Star, 2009)

[Lauren J. Mapp](#), Editor-in-Chief

November 5, 2012

Marie (not her real name) was a 15-year-old girl like many others – she was a soccer player who worked hard in her classes and had dreams of going to college to become a nurse. Unlike many students, though, she had a secret.

At home Marie’s stepfather abused her on a regular basis, and after several years of sexual and physical trauma she became too afraid to stand up to him. Her solution was to run away from her family’s home in Eastlake.

“I couldn’t tell my mother because I knew it was gonna break her heart, and I was embarrassed to talk to anyone at school about it,” Marie said. “I got up and left and thought that I’d finally be safe.”

Instead of the safety she thought she was running away to, Marie instead found herself alone and hungry on the streets in downtown San Diego, wondering where she would turn next. When Bruce (also a pseudonym) asked her out to dinner, offering to pay, she gladly accepted. She and the 32-year-old immediately started dating, but within a few short weeks he revealed his plan to her for how they could make some quick cash: prostitution.

Having no other options, she reluctantly decided to go along with his idea, but Marie soon realized that the emotional turmoil would be more than she could bear.

“The first time was the hardest,” Marie said. “I kept thinking that it was wrong. This man was dirty, sweating, groping me, focused on getting laid and nothing else. I went back to Bruce’s apartment and cried myself



1 to sleep, saying I wouldn't do it again, but the next night I was back on  
2 the street."

3 America's Finest City is the eighth most prominent U.S. metro area for  
4 sex trafficking, according to the FBI (Los Angeles and San Francisco are  
5 also in the top 13). It is estimated that as many as 2,500 teenage  
6 runaways are in San Diego at any given time, and that most runaway  
7 children are approached for sex within 48 hours of being on their own,  
8 according to Generate Hope's Director of Development Holly Hepburn.  
9 Since 2010, Generate Hope – a San Diego non-profit organization – has  
10 been working with women ages 18 to 35 who are victims of sex  
11 trafficking, helping them break free from trafficking and reestablish  
12 themselves in mainstream society. Although Generate Hope helps  
13 victims from all areas, the majority are from San Diego County.  
14 "It's very much happening in our cities and in our schools," Hepburn  
15 said about sex trafficking-related crimes.

16 Eric Drilling, a vice detective in the San Diego Police Department, said  
17 the average age for entering into prostitution is 12 to 13. He said that  
18 most local victims of sex trafficking are from the San Diego area.  
19 Drilling said people might see girls working on streets known for  
20 prostitutes, such as El Cajon Boulevard, and think they are there freely,  
21 but that this is often a misconception.

22 "A vast majority of these girls have pimps, and it may appear that  
23 they're willing to do this, but there's a lot of psychological coercion that  
24 goes into pimping," Drilling said.

25 The Californians Against Sexual Exploitation Act, also known as  
26 Proposition 35, is an initiative to fight sex trafficking in California, will  
27 be on the ballot Tuesday. If passed, the so-called CASE Act would  
28 increase Megan's Law protections against online predators, increase  
prison terms for those convicted of sex trafficking and require that law  
enforcement agents have sufficient training on human trafficking.

1 The CASE Act would also create fines for convicted criminals. Funds  
2 raised from the fines would be used in services to help sex trafficking  
3 victims.

4 “I think it’s a good starting point because you’ve got to start  
5 somewhere,” Hepburn said about the CASE Act. “It’s a tough subject  
6 [and] it’s going to be tough to get [the law] passed. People are just  
7 starting to learn about it.”

8 Drilling believes changes in the law such as Prop 35 and increased  
9 funding for law enforcement are key to fighting sex trafficking.

10 “I’m a cop. I’m always going to advocate for more money,” he said.

11 “We could double the size of this [vice] unit, and it just means that many  
12 more girls off the street and that many more pimps in jail. Sentencing is  
13 something that certainly assists us with the goal of locking away people  
14 that engage in this activity.”

15 Marie finally got away from Bruce and selling her body, yet many more  
16 victims of sex trafficking remain in San Diego. Today, Marie has  
17 escaped from both the trauma of her abusive upbringing and the abusive  
18 lifestyle of working for Bruce, but many children are still trapped within  
19 abusive relationships

20 “I wish that there were options for me when I was being abused by my  
21 stepdad,” Marie said. “Other kids [shouldn’t have to] sell their bodies  
22 like I did at that age, and I hope that things change so girls can escape  
23 from [sex] trafficking easier.”

Trafficking victims are deceived by false promises of love, a good job, or a stable life and are lured or forced into situations where they are made to work under deplorable conditions with little or no pay. In the United States, trafficking victims can be American or foreign citizens.

Sep 28, 2022



Eve Doe  
8306 Wilshire Blvd  
#2020 Los Angeles, California 90211  
424-379-3619  
Eveemancipationdoe@gmail.com  
Propia Persona

UNITED STATES DISTRICT COURT  
DISTRICT OF  
Los Angeles  
For removal to The Supreme Court of the United States  
Writ of Certiorari In Preparation

Eve Doe,

Plaintiff,

vs.

QUINN EMANUEL URQUHART & SULLIVAN  
LLP

) Case No. 2:23-cv-04896-GW-ASx

)  
)  
)  
) **STATEMENT IN SUPPORT OF OBJECTION TO**  
) **JUDGE Steve Kim and Presiding Judge**  
) **Maame Frimpong; EXHIBITS, The Court**  
) **Record,**

) **DEPT: 540**

) **JUDGE: Hon. Alka Sagar**  
)  
)  
)  
)

TO THE CLERK OF THIS COURT AND ALL OTHER INTERESTED PARTIES  
AND THEIR ATTORNEYS OF RECORD:  
PLEASE TAKE NOTICE that **PLAINTIFF,**

1 **Eve Doe** HEREBY OBJECTS to the Presiding Judge Maame Frimpong and Hon. **Judge Steve Kim**  
2 presiding at any further hearings or proceedings concerning this action. Said objection is based on  
3 the grounds and upon the facts set forth in the declaration of Eve Doe and exhibits attached thereto,  
4 concurrently filed and served herewith and incorporated herein by reference.  
5

6 Dated July 1, 2023

Eve Doe

*Eve Emancipation Doe*

28 **DECLARATION OF Amber Doe**

1 I, Eve Doe declare as follows:

2 1. I am a party to this action and am over the age of 18 years. I have  
3 personal firsthand knowledge of the facts set forth herein and if called as a witness could and would  
4 testify competently to the truth of the facts set forth herein.  
5

6 2. I make this declaration in support of my objection to the Hon. Steve Kim presiding at  
7 any further proceedings in this action.  
8

9 3. The Hon. Mama Frimpong and Hon. Steve Kim is disqualified to preside at any  
10 further proceedings in this action on the grounds that: This case was filed June 19th 2023. Within 5  
11 days of the date of filing the complaint for Bad Faith 2. Conspiracy 3. Obstruction of Justice 4.  
12 Personal Injury 5. Fraud 6. Attorney Interference 7. Stalking 8. Violation of the Trafficking Victims  
13 Protection Act 9. Racketeering 10. Civil Theft 11. Wrongful Death 12. Deceit 13. INTENTIONAL  
14 INTERFERENCE WITH ECONOMIC RELATIONS 14. Unjust enrichment 15. Malicious  
15 Prosecution 16. INTERFERENCE WITH EXISTING CONTRACT- NEGLIGENT  
16 17. INTERFERENCE WITH EXISTING CONTRACT-INTENTIONAL 18. MONEY HAD AND  
17 RECEIVED 19. WILLFUL MISCONDUCT 20. UNFAIR COMPETITION VIOLATION OF PUBLIC  
18 POLICY 21. BREACH OF PRIVACY 22. Intentional infliction of emotional distress  
19 23. PROFESSIONAL NEGLIGENCE 24. Violation of Victims of Crime Act 25. Violation of Marcys  
20 law 26. Violation of Ambers Law 27. Defamation 28. Violation of Megans Law 29. Violation of  
21 Jessies law 30. Violation of Jessicas Law 31. Violation of Chelseas Law 32. Unlawful Endangerment  
22 33. Violation of the Bane act 34. Violation of the Ralph act 35. GROSS NEGLIGENCE 36. Tortious  
23 Interference 37. Trespass to chattels 38. Conversion 39. Violation of the Ku Klux Klan act 40.  
24 Violation of the Mann Act 41. Violation of the Human Rights Act 42. Violation of The California  
25  
26  
27  
28

1 Constitution 43. Invasion Of Privacy 44. False Light 45. Inciting Gender Violence 46. Legal  
2 Misconduct 47. Negligent Supervision of Diane Doolittle 48. INTERFERENCE WITH MEDICAL  
3 TREATMENT

4  
5 The fee waiver should have been granted as I have declared under penalty of perjury that I can not  
6 afford to pay for filing fees in the instant case or the the filing fees in the several other cases where  
7 my situation of human trafficking is being exploited for profit by dozens if not hundreds of lawyers  
8 from the largest law firms in the unites states. The fee waiver still has not been granted by Hon.  
9 Steve Kim. Nor Hon Maame Frimpong who evidently are intent on depriving plaintiff of her right to  
10 life while acting under the color of the law.  
11

12  
13  
14 Plaintiff no longer believes that these judges are capable of not violating plaintiffs constitutional  
15 rights to a fair trial on the merits of any of the cases against any of the defendants that have harmed  
16 her and robbed her of all of her life freedom and liberties after they discovery she has been a victim  
17 of human trafficking since the age of fifteen.  
18

19  
20 Both of these federal judges have taken oaths both judges are paid for by the people and are a  
21 branch of the government to serve the people not to deprive people of their human rights,  
22 constitutional rights and civil rights.  
23

24  
25 Hon. Maame Frimpong appointed by the President of the United States of America is a Black  
26 women in America, privileged enough to have attended Harvard and Yale has been a lawyer for many  
27 years was employed at the department of justice and knows that not only plaintiff in this case but all  
28

1 people have the rights ratified in the U.S. constitution and its amendments. These judges are required  
2 by law and their appointments as officers of the court to never deprive anyone of their conditional  
3 rights nor their civil rights.  
4

5  
6 Plaintiff has requested new judges and has previously filed a motion to disqualify Justice Steve Kim  
7 for being prejudice and biased against plaintiff without ever having seen or spoken to her he  
8 stigmatized her.  
9

10  
11 Plaintiff has agreed not to sue the 14 judges who have deprived her of her rights while acting under  
12 the color of the law, yet these federal judges know that Plaintiff has the right to sue all defendants in  
13 the instant case having reviewed the evidence implicating showing the merits of all her cases if they  
14 went before judge and jury plaintiff would win all of the cases, yet these Judges are still willing to  
15 deprive plaintiff of her rights with zero legal basis to do so which again Invalidates the United States  
16 Constitution.  
17  
18

19  
20 Even worse these Judges are well aware that if plaintiff is not afforded a trial against defendants  
21 she will die after already being enslaved, raped, deprived of medical treatment, being forced into  
22 homelessness and for over 9 years after being forced from her only home, plaintiff has been enduring  
23 every possible the of obstruction of the civil and criminal justice systems by defendants.  
24  
25  
26  
27  
28

1 Plaintiff agrees not to sue any of the Judges who's actions have caused her irreparable harm but  
2 respectfully requests new Judges capable of being fair and unbiased and acting as they are appointed  
3 to do and act ethically under the color of the the law.  
4

5  
6 Every time another judge derives Plaintiff of her rights they are signing plaintiffs death certificate  
7 because they have been made aware that without the critical medical treatment require to save  
8 plaintiffs life that she has been deprived of she will die.  
9

10  
11 Justice Kim And Justice Frimpong the Judges are also aware that because of the deprivation of all  
12 of her rights and obstruction of justice plaintiff has been forced into homelessness.  
13

14  
15 Honorable Frimpong whom plaintiff was happy to have as her judge and believed would extend  
16 her a fair trial might refer to her own answers from interviews she has given as to why she wants to  
17 be a Judge and how she justifies depriving plaintiff of a fair trial by jury within her duties or  
18 profession that she wants to be a judge to make society fair and that it is Honorable Frimpong's  
19 sincere hope that everyone walks away with greater confidence in our justice system and a greater  
20 understanding of the role that judges play in making our Constitutional rights a reality.  
21  
22 .  
23

24 After serving on the Los Angeles County Superior Court for nearly two years, Judge Maame  
25 Ewusi-Mensah Frimpong '93 is seeking reelection. Judge Frimpong graduated from Vivian  
26 Webb School as Valedictorian of her class. She later graduated from Harvard University and  
27 went on to earn her law degree from Yale. After Frimpong started her legal career in a  
28 clerkship with a judge on the federal court of appeals, she worked at an international law  
firm, and then served in the Justice Department where she took on roles under Attorney  
General Eric Holder and Associate Attorney General Tony West during President Obama's

1 administration. She has practiced in numerous areas of the law, including white-collar  
2 crime, immigration, civil rights, environmental protection, and consumer protection. But  
3 serving on the Los Angeles County Superior Court has been the highlight of Frimpong's  
4 illustrious career. She was appointed to the bench in 2015 and hopes to be reelected later  
5 this year. Below, she reflects on her campaign, career and hopes for the future.

6 **Q. What made you want to become a judge?**

7 What may be surprising to some is that although I have wanted to be an attorney since I  
8 was a child, for most of my career, I had no interest in becoming a judge. For a long time, I  
9 thought the judge simply decided between the positions presented by the attorneys before  
10 her, and so the real power was held by those who crafted those arguments and presented  
11 them in court. I had wanted to become a lawyer to make society work better and fairer, so  
12 being an attorney seemed the best role for me. And I truly loved advocating for my clients.  
13 Over time, however, I came to see that the judge is also an advocate—for justice and the  
14 rule of law. The more I considered it, the more I felt drawn to the role. And ultimately, the  
15 opportunity to grapple with complex legal questions, make difficult decisions, demystify  
16 the justice system for the public, and protect the rights of all who come before me was too  
17 intriguing not to try.

18 **Q. Your website notes that serving in the court has been the highlight of your career.  
19 Why is that?**

20 I have always loved the law and loved being an advocate for my client during my years as a  
21 practicing attorney. I feel that now I am an advocate for justice and the rule of law and our  
22 system of democracy, which is extremely gratifying. Serving as a judge is also extremely  
23 challenging as you are presented with new scenarios every day and the law is constantly  
24 changing. I love anything with a steep learning curve. As a judge on the Los Angeles  
25 Superior Court, my work is challenging, meaningful, and interesting, and my colleagues are  
26 smart, collegial, ethical, and committed to doing the right thing. That is my definition of a  
27 dream job!

28 **Q. What do you want to achieve during a second term?**

I want to build on what I had the opportunity to do during my first term—advocate for  
justice and the rule of law, demystify the justice system for the general public, and ensure  
that every individual in my courtroom is treated with dignity and respect.

It is very important for me to always stay abreast of changes in the law, always be prepared  
for every hearing, and always make thoughtful, considered, and deliberate decisions. In  
addition, every judge is responsible for the “tone” set in her courtroom. For me, I hope to  
continue to set a tone that is warm, but recognizes the importance and formality of the  
proceedings, and, above all, ensures that every individual—every juror, every witness, every

defendant, every attorney—is treated with dignity and respect. Even if someone is accused of or convicted of a crime, he is still entitled to be treated with dignity and respect.

Finally, one of the best parts of my job is helping the general public understand the justice system. I get to do this with prospective jurors, but I also take every opportunity outside of my courtroom to do this, especially with young people. For example, I am one of three judges handling the Teen Court program at a local high school where minors charged for the first time with relatively low-level offenses get a “trial” by a jury of their peers—other high school students. The program is a great way to introduce the accused minor as well as the jurors and other participants at the high school to the principles of our justice system that we are so proud of. I am excited to continue the Teen Court program and other community outreach initiatives.

**Q. Are you focusing on anything specific in your campaign?**

Yes. For me, the campaign has given me an opportunity and a platform to discuss why it is important to have judges that are competent, fair, and compassionate. It is my sincere hope that everyone I speak with as I campaign walks away with greater confidence in our justice system and a greater understanding of the role that judges play in making our Constitutional rights a reality.

Most of us understand that we have certain rights based upon our Constitution, and many of us understand that the Supreme Court plays a role in interpreting those rights, but I think few people understand that it is ordinary judges like me who protect those rights every time you are in a courtroom. For example, the Supreme Court has determined that our Constitution protects us from unreasonable searches and seizures by the police. It is judges like me, however, that determine, in any given case, if the police action was unreasonable, according to the law.

**Q. You have worked in a variety of roles during your legal career. Is there one in particular that prepared you for this role the most? Or is there an important lesson you learned during one of those jobs?**

I really draw on skills developed in all of my roles nearly every day. But if there is one lesson that I learned from my earliest days as a judicial law clerk until my most recent role as a general counsel, it was to never compromise on doing justice and getting the answer right. In my years at the Justice Department under President Obama and Attorney General Holder, this was emphasized in everything that we did. I was often inspired by a quote over the door to the Attorney General’s Office in the Department of Justice in Washington, DC: the United States wins its case whenever justice is done one of its citizens in the courts. The emphasis was on doing justice, not winning cases. And this has translated seamlessly for me to my role as a judge: My North Star should always be doing justice, not ensuring that a particular side wins.



**Q. Do you think Webb had any impact on your values, work ethic or career path?**

Absolutely! All three! Webb certainly cultivated in me a drive for excellence, and at Webb I learned that to do well, I needed to work very hard. Ultimately, I believe my work ethic came from my parents, but it was further developed at Webb. And, although I am not sure I realized it at the time, the Honor Code system greatly impacted me. I probably already came into Webb as a young person who valued honesty and integrity, but at Webb, I was placed in a community of young people who were also striving to make the principles of honesty and integrity reality on a day-to-day basis. As a lawyer, and now as a judge, my integrity is sacrosanct. I never want to compromise it. And Webb certainly influenced my career path—those hours spent poring over the Federalist Papers and the other great documents of our history impressed upon me the beauty and brilliance of our legal system, and made me excited to be a part of it.

**Q. Is there anything you think differentiates the Vivian Webb School alumni network from other alumni networks?**

There is something special about a girls school, even a girls school within a coordinate environment such as Webb. In my most formative years, I was taught that there was nothing second-class about a women-only environment; to the contrary, there was much to be celebrated. I work in a male-dominated field, and have worked in male-dominated environments for much of my career. I distinctly recall numerous meetings, negotiations, or court proceedings where I was the only female lawyer; now I am one of a minority of female judges. This has been challenging at times, but I never let anyone make me feel as though I did not belong. And the ladies I met at Webb continue to inspire me because they are phenomenal women who support other phenomenal women.

**Q. What would you want alumni who haven't met you to know about you?**

That what motivates me now, and what has motivated me throughout my career is the opportunity to make a difference in people's lives. My career has been the product of hard work, wonderful relationships, and serendipity. I feel so blessed that my parents, through their hard work and sacrifices, were able to give me such a great start at Webb, which has led me to where I am today.

Even though plaintiff was trafficked at a young age plaintiff believed in the criminal and Civil Justice system and everyone who has watched and endured what plaintiff has been put through in this Justice system now doubts that there is any Justice in the system we all once had confidence in.

1 Realizing that slavery still exists today in different forms is critical for women in positions of power  
2 not to persist in being part of the problem caused by men but to start facilitating in bringing an end to  
3 the sexual slavery and exploitation of girls and women.  
4

5  
6 If female judges or any judge is willing to say these girls and women have no legal rights there is  
7 not hope of ending modern day slavery, child pornography, human trafficking, child sex trafficking or  
8 child molestation.  
9

10  
11 Plaintiff knows that what has happened to her is wrong on every level. Plaintiff knows that she  
12 will die at a sooner date that she ever would have if justice had not been obstructed.  
13

14  
15 These facts are true and in evidence. Plaintiff is determined that her life and all that she has suffered  
16 will not be in vain and that at the very least her voice will assure that other children will not face the  
17 same fate and be robbed of their lives.  
18

19  
20 Plaintiff respectfully requests that these judges be disqualified and not interfere in plaintiffs right to  
21 bring lawsuits against these lawyers for all of their malice the traffickers or plaintiffs former lawyers  
22 the surgeon and the hospital. The underlying facts in all of these cases are the same the evidence is  
23 the same and none of these would have happened to plaintiff if she was not trafficked by an organized  
24 crime syndicate into the hands of a notorious sexual predator who's lawyers and plaintiffs former  
25 lawyers continue to conspire and are trying to secure a 100 million dollar settlement against plaintiff  
26  
27  
28

1 by obstructing justice further indebting plaintiff who has no money to feed herself, provide herself  
2 with shelter or medical treatment.  
3

4  
5 In Addition Hon. Maame Frimpong Hon. Steve Kim is aware that plaintiff has to represent herself  
6 against all of these powerful defendants has no law degree and is in dire need of medical treatment  
7 which has been removed from her by the absolute abuse of legal process obstruction of justice and  
8 Abuse she has endured. She is denied Legal Aid And public Counsel.  
9

10  
11 In furtherance of the abuse of process and obstruction of Justice by sexual predator and His  
12 lawyers Quinn Emanuel They have filed multiple motions and pleadings in the multiple cases and  
13 refuse to serve a single pleading or notice to Eve Doe although she made innumerable demands for  
14 service of legal pleading for a cases in which she is either a plaintiff, defendant or witness.  
15

16  
17 Plaintiff has the right to proceed to trial expeditiously she has already been victimized by the  
18 Lawyers in this case since Feb 2014. It is Now July 2023.  
19

20  
21 Plaintiff Does not know how the Lawyers from Quinn Emanuel are obtaining Signatures From Hon.  
22 Steve Kim on the motions they file as she can not see any hearing date nor can she see any nor can  
23 she see un-redacted pleadings because they are not on pacer.  
24  
25  
26  
27  
28

1 Plaintiff must not be denied her rights under the constitution to have a trial by jury any longer the  
2 entire constitution of the United States would be come invalid if this abuse of process continues. The  
3 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
4 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
5

6  
7 My rights can not be invalidated by the mis use of the illegally procured “Gag Order” in the form  
8 of a restraining order when plaintiff is the one who was raped trafficked and being stalked Plaintiff  
9 has never owned and weapons does not carry any weapons. Plaintiff has never trafficked any person  
10 raped any person nor has she obstructed justice.  
11

12  
13 These judges are aware that plaintiff has been victimized be a great many people inclusive of the  
14 lawyers in the instant case. To deprive plaintiff of her right to the justice system again is improper.  
15 And only serves to delay proceedings.  
16

17  
18 If Judges plan is to wait for plaintiff to die as a way to silence her about all of the crimes  
19 committed against her during her lifetime this serves zero purpose as plaintiffs surviving family who  
20 have been harmed through the Malicious conspiracy by the lawyers in the instant case intend to sue  
21 for all the causes of action in addition to plaintiffs wrongful death.  
22  
23  
24  
25  
26  
27  
28

1 . A person aware of the facts might reasonably entertain a doubt that the judge would be  
2 able to be impartial in that these Judges are intent on covering up a sex trafficking conspiracy helping  
3 Quinn Emanuel continue to obstruct justice and bring further harm to plaintiff.  
4

5  
6 Plaintiff accepts Judge Alka Sagar to be the magistrate in her case and believes that she will then not  
7 be deprived of her rights as this is the proper jurisdiction for the instant case Los Angeles district  
8 court in the Central district for California. This is the correct Jurisdiction for the case as most of the  
9 defendants and companies are based in Los Angeles. The Amount in dispute is over \$75,000.00. The  
10 cases includes international boundaries.  
11

12  
13  
14 The Judges must not circumvent the law by continuing to deprive plaintiff of her Constitutional  
15 rights, civil rights and human rights.  
16

17 . I first became aware of the grounds for disqualification of judge when the 5th business day  
18 had passed after my fee waiver was enter with the court and The judges Failed to sign it. There after  
19 plaintiff seen that her instant case unrelated to former case filed for deprivation of Civil rights filed  
20 against Judges who allowed defendants to repeatedly obstructed justice which lead to plaintiffs  
21 current situation. The instant case is only against the named defendants and filed under a pseudonym  
22 so that everyone stops attacking plaintiff and depriving her of her rights.  
23

24  
25 Plaintiff Noticed that Justice Frimpong transferred this unrelated case to her docket for no apparent  
26 reason no work has to be repeated as the Judes have yet to even sign a fee waiver let alone make any  
27 legal rulings.  
28

1  
2  
3 No Denial of my request for fee waiver has been entered by the court and there is no legal basis to  
4 deny plaintiff a fee waiver as the court is aware plaintiff has no money to pay filing fees but is willing  
5 to pay the court back after trial.  
6

7  
8 Plaintiff requests no favoritism she request after 9 years of enduring having all of her legal rights  
9 tampered with and obstructed by defendants that she be treated like a human being who lives and  
10 breaths and be extended her right of trial by Jury.  
11

12  
13 Why would any judge let alone a federal Judge want plaintiff to be raped murdered homeless  
14 trafficked or left to die with no medical treatment when she has the right to a trial to rectify all of  
15 this?  
16

17  
18 Plaintiff requests any judge in Federal court that will not prejudice and stigmatize plaintiff and  
19 allow the defendants to continue to obstruct the civil and criminal judicial process. This  
20 disqualification must take place in the name of fair access to the courts by all and to prevent further  
21 violations of my human rights, constitutional rights and civil rights.  
22

23  
24 Judges might find it odd that plaintiff is pleading with them for a trial but plaintiff is accustom to  
25 negotiating her survival on a daily basis with a very powerful international organized crime syndicate  
26 so requesting judges not to deprive plaintiff of her life is far less dangerous.  
27  
28

1  
2 I am presenting this verified statement at the earliest possible opportunity.

3  
4 In this case, Judge Steve Kim exceeded the bounds of reasonable conduct for a judge  
5 seeking to exercise control of the proceedings and reach an unfair and efficient result.

6  
7 The behavior of Judge Steve Kim involved conduct that clearly did not afford me a reasonable  
8 opportunity to be heard and present my evidence. The obligation of a judge to dispose of matters  
9 promptly and efficiently must not take precedence over the judge's obligation to dispose of the  
10 matters fairly and with patience. For example the Canons of Judicial Ethics state in pertinent part  
11 that, when a litigant is self-represented, a judge has the discretion to take reasonable steps,  
12 appropriate under the circumstances and consistent with the law and the canons, to enable the litigant  
13 to be heard. ... *Cannon 3, Advisory Comm. Commentary*, Page 17, Lines 24-30.

14  
15 I declare under penalty of perjury under the laws of the State of California that the foregoing  
16 is true and correct and that this declaration is executed on May 18, 2023 at Los Angeles, California.

17  
18 I, Eve Doe declare that: all that has been put forth in this statement to disqualify Judges  
19 Honorable Maame Frimpong and Justice Steve Kim

20  
21 I am a party to this action.

22  
23 My testimony is accurate and I declare that the same is true of my own knowledge, except as  
24 to those matters which are therein stated upon my information and belief, and to those matters I  
25 believe them to be true.

26  
27 I declare under penalty of perjury under the laws of the State of California, that the foregoing  
28 is true and correct.

Executed this 1st day of July, 2023, at

Los Angeles , California.

Amber Doe

## MEMORANDUM OF POINTS AND AUTHORITIES

### I.

#### STATEMENT OF FACTS

This case is **CIVIL ACTION For** 1. Bad Faith 2. Conspiracy 3. Obstruction of Justice 4. Personal Injury 5. Fraud 6. Attorney Interference 7. Stalking 8. Violation of the Trafficking Victims Protection Act 9. Racketeering 10. Civil Theft 11. Wrongful Death 12. Deceit 13. INTENTIONAL INTERFERENCE WITH ECONOMIC RELATIONS 14. Unjust enrichment 15. Malicious Prosecution 16. INTERFERENCE WITH EXISTING CONTRACT- NEGLIGENT 17. INTERFERENCE WITH EXISTING CONTRACT-INTENTIONAL 18. MONEY HAD AND RECEIVED 19. WILLFUL MISCONDUCT 20. UNFAIR COMPETITION VIOLATION OF PUBLIC POLICY 21. BREACH OF PRIVACY 22. Intentional infliction of emotional distress 22. Intentional infliction of emotional distress 23. PROFESSIONAL NEGLIGENCE 24. Violation of Victims of Crime Act 25. Violation of Marcys law 26. Violation of Ambers Law 27. Defamation 28. Violation of Megans Law 29. Violation of Jessies law 30. Violation of Jessicas Law 31. Violation of Chelseas Law 32. Unlawful Endangerment 33. Violation of the Bane act 34. Violation of the Ralph act 35. GROSS



1 NEGLIGENCE 36. Tortious Interference 37. Trespass to chattels 38. Conversion 39. Violation of the  
2 Ku Klux Klan act 40. Violation of the Mann Act 41. Violation of the Human Rights Act 42. Violation  
3 of The California Constitution 43. Invasion Of Privacy 44. False Light 45. Inciting Gender Violence  
4  
5 46. Legal Misconduct 47. Negligent Supervision of Diane Doolittle 48. INTERFERENCE WITH  
6 MEDICAL TREATMENT

7  
8  
9 Quinn Emanuel lawyers have acted in SUPREME ABSOLUTE MALICE and have obstructed justice  
10 on behalf of Client for over 9 years and Victimized Eve Doe

11  
12 Eve Doe Doe objects to the Hon. Steve Kim presiding at any further hearings or proceedings  
13 concerning this action on the grounds that a person aware of the facts might reasonably entertain a  
14 doubt that the judge would be able to be impartial in that he as already been made aware that  
15 Plaintiffs rights have been violated and that she is not being served the pleadings or times and dates  
16 that Quinn Emanuel who are both witnesses and defendants in the case are going before the judge and  
17 obtaining his signature on legal documents refer to court record.  
18  
19

20  
21  
22 The Hon. Steve Kim is disqualified to preside at any further proceedings in this action on the  
23 grounds that: This case was filed June 19th, 2023. Within 5 days of the date of filing the complaint  
24 for

25  
26 1. Bad Faith 2. Conspiracy 3. Obstruction of Justice 4. Personal Injury 5. Fraud 6. Attorney  
27 Interference 7. Stalking 8. Violation of the Trafficking Victims Protection Act 9. Racketeering 10.  
28

1 Civil Theft 11.Wrongful Death 12.Deceit 13.INTENTIONAL INTERFERENCE WITH  
2 ECONOMIC RELATIONS 14.Unjust enrichment 15.Malicious Prosecution 16.INTERFERENCE  
3 WITH EXISTING CONTRACT- NEGLIGENT 17.INTERFERENCE WITH EXISTING  
4 CONTRACT-INTENTIONAL 18.MONEY HAD AND RECEIVED 19.WILLFUL  
5 MISCONDUCT 20.UNFAIR COMPETITION VIOLATION OF PUBLIC POLICY 21.BREACH  
6 OF PRIVACY 22.Intentional infliction of emotional distress 23.PROFESSIONAL NEGLIGENCE  
7 24.Violation of Victims of Crime Act 25.Violation of Marcys law 26.Violation of Ambers Law 27.  
8 Defamation 28. Violation of Megans Law 29.Violation of Jessies law 30.Violation of Jessicas Law  
9 31.Violation of Chelseas Law 32. Unlawful Endangerment 33.Violation of the Bane act  
10 34.Violation of the Ralph act 35.GROSS NEGLIGENCE 36. Tortious Interference 37. Trespass to  
11 chattels 38.Conversion 39. Violation of the Ku Klux Klan act 40. Violation of the Mann Act 41.  
12 Violation of the Human Rights Act 42. Violation of The California Constitution 43. Invasion Of  
13 Privacy 44. False Light 45. Inciting Gender Violence 46. Legal Misconduct 47.Negligent  
14 Supervision of Diane Doolittle 48. INTERFERENCE WITH MEDICAL infliction of emotional  
15 distress  
16  
17  
18  
19

20 2. The fee waiver should have been granted as I have declared under penalty of perjury that I can not  
21 afford to pay for filing fees in the instant case or the the filing fees in the several other cases where  
22 my situation of human trafficking is being explored for profit by dozens if not hundreds of lawyers  
23 from the largest law firms in the Unites States. 50 days after the filing of the fee waiver it still has  
24 not been granted by Hon. Steve Kim.  
25

26 Secondly Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful  
27 defendants has no law degree and is in dire need of medical treatment which has been removed from  
28

1 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
2 denied Legal Aid And public Counsel.

3 In further of the abuse of process and obstruction of Justice by Quinn Emanuel They have filed  
4 multiple motions and pleading in the instant case and refused to serve a single pleading or notice to  
5 Eve Doe although she has made numerous demands for service of the pleadings per week.  
6

7 Plaintiff has repeatedly stated under oath to the courts that she is not BEING served legal pleadings  
8 discovery motions or anything related to at least tree cases where she is either the plaintiff or  
9 defendants in multiple jurisdictions.  
10

11 Eve Doe has the right to proceed to trial expeditiously she has already been victimized by the  
12 Lawyers in this case since Feb 2014. It is Now July, 2023.  
13

14  
15  
16 It is in evidence that Hon. Steve Kim Believes that a separate set of laws and rules of the court apply  
17 to Eve Doe that the rest of humanity.  
18

19  
20 Eve Doe must not be denied her rights under the constitution to have a trial by jury any longer the  
21 entire constitution of the untied states would be come invalid if this abuse of process continues. The  
22 Constitution extends to all humans not only the rich and the guilty and for those who the court feels  
23 deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.  
24  
25  
26  
27  
28

1 II.

2 ARGUMENT

3 A. CALIFORNIA LAW STATES THAT A JUDGE IS DISQUALIFIED WHERE  
4 THEY HAVE A FINANCIAL INTEREST IN A PARTY TO THE ACTION OR FOR  
5 ANY REASON OTHER PERSONS AWARE OF THE FACTS MIGHT REASONABLY  
6 ENTERTAIN A DOUBT THAT THE JUDGE WOULD BE ABLE TO BE IMPARTIAL AND A  
7 JUDGE’S BIAS TOWARDS A PARTY IS CLEARLY A GROUND FOR  
8 DISQUALIFICATION  
9  
10

11 California law states that a judge is disqualified where, for any reason:

12 “The judge has a financial interest in the subject matter in a proceeding or in a party to the  
13 proceeding”. See *Code of Civil Procedure* § 170.1(a)(3)(A)  
14

15 “Other persons aware of the facts might reasonably entertain a doubt that the judge would be  
16 able to be impartial”. See *Code of Civil Procedure* § 170.1(a)(6)(A)(iii).

17 *Code of Civil Procedure* §170.5 states in pertinent part that, “For the purposes of Sections 170  
18 to 170.5, inclusive, the following definitions apply:  
19

20 (a) “Judge” means judges of the superior courts, and court commissioners and referees.

21 (b) “Financial interest” means ownership of more than a 1 percent legal or equitable interest  
22 in a party, or a legal or equitable interest in a party of a fair market value in excess of one thousand  
23 five hundred dollars (\$1,500), or a relationship as director, advisor or other active participant in the  
24 affairs of a party, except as follows:  
25  
26  
27  
28

1 The test for impartiality is objective in that “The situation must be viewed through the eyes of  
2 the ... average person on the street” as of the time the motion is brought. *United Farm Workers of*  
3 *America v. Sup.Ct. (Maggio, Inc).* (1985) 170 Cal. App. 3d 97, 104 (emphasis added).

4  
5 “The word ‘might’ in the statute was intended to indicate that disqualification should follow if  
6 the reasonable man, were he to know all the circumstances, would harbor doubts about the judge's  
7 impartiality.” *United Farm Workers of America v. Sup.Ct. (Maggio, Inc.)*, supra, 170 Cal.App. 3d at p.  
8 104 (emphasis added).

9  
10 Judge Steve Kim also exhibited bias towards Eve Doe in that The Hon. Steve Kim is  
11 disqualified to preside at any further proceedings in this action on the grounds that: This case was  
12 filed June 19th, 2023. Within 5 days of the date of filing the complaint for

13  
14 1.Bad Faith 2. Conspiracy 3. Obstruction of Justice 4. Personal Injury 5. Fraud 6. Attorney  
15 Interference 7. Stalking 8. Violation of the Trafficking Victims Protection Act 9. Racketeering 10.  
16 Civil Theft 11.Wrongful Death 12.Deceit 13.INTENTIONAL INTERFERENCE WITH  
17 ECONOMIC RELATIONS 14.Unjust enrichment 15.Malicious Prosecution 16.INTERFERENCE  
18 WITH EXISTING CONTRACT- NEGLIGENT 17.INTERFERENCE WITH EXISTING  
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21 OF PRIVACY 22.Intentional infliction of emotional distress 23.PROFESSIONAL NEGLIGENCE  
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26 31.Violation of Chelseas Law 32. Unlawful Endangerment 33.Violation of the Bane act  
27  
28 34.Violation of the Ralph act 35.GROSS NEGLIGENCE 36. Tortious Interference 37. Trespass to

1 chattels 38. Conversion 39. Violation of the Ku Klux Klan act 40. Violation of the Mann Act 41.  
2 Violation of the Human Rights Act 42. Violation of The California Constitution 43. Invasion Of  
3 Privacy 44. False Light 45. Inciting Gender Violence 46. Legal Misconduct 47. Negligent  
4 Supervision of Diane Doolittle 48. INTERFERENCE WITH MEDICAL The fee waiver should  
5 have been granted as I have declared under penalty of perjury that I can not afford to pay for filing  
6 fees in the instant case or the the filing fees in the several other cases where my situation of human  
7 trafficking is being explored for profit by dozens if not hundreds of lawyers from the largest law  
8 firms in the United States Of America.  
9  
10

11  
12 The Hon. Steve Kim and The Honorable Maame Frimpong are disqualified from presiding at any  
13 further proceedings in this action on the grounds that: This case was filed June 19th, 2023. Within 5  
14 days of the date of filing the complaint The fee waiver should have been granted as I have declared  
15 under penalty of perjury that I can not afford to pay for filing fees in the instant case or the the filing  
16 fees in the several other cases where my situation of human trafficking is being exploited for profit  
17 by dozens if not hundreds of lawyers from the largest law firms in the unites states. 50 days after the  
18 filing of the fee waiver it still has not been granted by Hon. Steve Kim.  
19  
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23  
24 Hon. Steve Kim is aware that plaintiff has to represent herself against all of these powerful  
25 defendants has no law degree and is in dire need of medical treatment which has been removed from  
26 her by the absolute abuse of legal process obstruction of justice and Abuse she has endured. She is  
27 denied Legal Aid And public Counsel.  
28

1  
2 What Hon Steve Kim And Hon Maame Frimpong have to gain by depriving plaintiff of her right to  
3 proceed to trial is not clear. What is clear is that these Judges know that Plaintiff has the  
4 constitutional right to proceed to trial on the merits of her case.  
5

6  
7 If plaintiff can not proceed to trial she will invoke her right to peacefully protest the deprivation of  
8 her right to a trial which someone will likely try to deprive her of that constitutional right as will.  
9

10  
11 Plaintiff will never understand why she is nota person in the eyes of the world  
12

13  
14 She had the right not to be enslaved

15 She had the right to a trial by jury

16 She had the right not to have possession illegally seized

17 She has the right to medical treatment

18 She has the right not to be homeless

19 She has the right not to be raped

20 She has the right of self protection ‘

21 She has the right of free speech

22 She has the right of medical privacy

23 She has the right not to be stalked by men

24 She has the right of Due process

25 She has the right Of freedom and Liberty  
26  
27  
28

Eve Doe has the right to proceed to trial expeditiously she has already been victimized by the Lawyers at Quinn Emanuel in the defendants in this case since February 2014. It is Now July, 2023.

Eve Doe must not be denied her rights under the constitution to have a trial by jury any longer the entire constitution of the United States would be come invalid if this abuse of process continues. The Constitution extends to all humans not only the rich and the guilty and for those who the court feels deserve a trial by Jury. All humans are equal in the eyes of the law whether they are slaves or not.

Plaintiff has expressed that she is homeless without medical treatment and this will cause her a premature death. She has no money to pay for shipping fees for filings she has no money for paper and printing services. E-filing is extended to mostly everyone else and is better for the environment. The request for exiling should have been granted.

Bias exists where the judge evidences a “predisposition to decide a cause or an issue in a certain way, which does not leave the mind perfectly open to conviction.” The judge's bias toward a party is clearly ground for disqualification. *Pacific & Southwest Annual Conf. of United Methodist Church v. Sup.Ct. (Barr)* (1978) 82 Cal.App. 3d 72, 86.



1                   **B.       THE STATUTES GOVERNING DISQUALIFICATION FOR CAUSE IN**  
2 **CALIFORNIA ARE INTENDED TO ENSURE PUBLIC CONFIDENCE IN THE**  
3 **JUDICIARY AND TO PROTECT THE RIGHTS OF LITIGANTS TO A FAIR AND**  
4 **IMPARTIAL ADJUDICATOR AND THE UNITED STATES SUPREME COURT HAS**  
5 **STATED THAT A FAIR TRIAL IN A FAIR TRIBUNAL IS A BASIC REQUIREMENT OF**  
6 **DUE PROCESS**

8                   The conduct exhibited by Judge Steve Kim showed clear evidence of bias and prejudice and  
9 deprived Amber Doe of their right to a fair and impartial adjudicator. This conduct also deprived him  
10 of his right to a fair trial in a fair tribunal which is a basic requirement of due process as stated by the  
11 United States Supreme Court.  
12

13                   The California Supreme Court has stated that the, "Statutes governing disqualification for  
14 cause are intended to ensure public confidence in the judiciary and to protect the right of the litigants  
15 to a fair and impartial adjudicator." *Curle v. Superior Court* (2001) 24 Cal.4th 1057, 1070.  
16

17                   The United States Supreme Court has stated that, it is "axiomatic that [a] fair trial in a fair  
18 tribunal is a basic requirement of due process." *Caperton v. A. T. Massey Coal Company*, (2009)  
19 556 U.S. 868, 876. In *Caperton* the Supreme Court also stated that the due process clause of the  
20 federal Constitution (US Const amend XIV) can require judicial disqualification even in cases where  
21 the party requesting disqualification has not complied with any applicable state disqualification  
22 statutes, and that a showing of actual bias is not required for judicial disqualification under the due  
23 process clause.  
24  
25  
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1 “The Due Process Clause entitles a person to an impartial and disinterested tribunal...”  
2 *Marshall v. Jerrico, Inc.* (1980) 446 U.S. 238, 242; see also *Brown v. American Bicycle Group, LLC*,  
3 (2004) 224 Cal.App.4th 665, 674.

4  
5 The well-established common law rule is that recusal is required when a judge has a direct,  
6 personal, substantial, or pecuniary interest in a case. *Caperton v. A.T. Massey Coal Co.*, supra, 556  
7 U.S. at p. 876-77; see also *Aetna Life Ins. Co. v. Lavoie*, (1986) 475 U.S. 813, 820.

8  
9 Judges have a duty to make their decisions free from any bias or prejudice. *Cal Rules of Ct*,  
10 Standards of J Admin 10.20; *Cal Rules of Ct*, *Code of Judicial Ethics*, Canon 3B(5).

11 “(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the  
12 performance of judicial duties, engage in speech, gestures, or other conduct that would reasonably be  
13 perceived as (1) bias or prejudice, including but not limited to bias or prejudice based upon race, sex,  
14 gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status,  
15 socioeconomic status, or political affiliation, or (2) sexual harassment. “

16  
17 Judge also have a duty to require lawyers in proceedings before them to refrain from  
18 manifesting any bias or prejudice. *Code of Judicial Ethics*, Canon 3B(6).

19  
20 “(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting,  
21 by words or conduct, bias or prejudice based upon race, sex, gender, religion, national origin,  
22 ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political  
23 affiliation against parties, witnesses, counsel, or others.”

24  
25 Judges have a duty to allow every party to a legal proceeding the full right to be heard  
26 according to law. *Code of Judicial Ethics*, Canon 3B(7).

1 “(7) A judge shall accord to every person who has a legal interest in a proceeding, or that  
2 person’s lawyer, full right to be heard according to law.”

3 **C. Eve Doe HAS SHOWN COMPELLING EVIDENCE IN SUPPORT OF THEIR**  
4 **OBJECTION** see court record no filing has been served on Plaintiff by defendants yet they  
5 have procured multiple signatures from Hon. Steve Kim on their pleadings that they have not  
6 served Plaintiff nor have they provided her the signed copies and she has no access to a credit  
7 card as Quinn Emanuel tampered with plaintiffs banks and demanded they remove her access  
8 to all credit products inclusive of credit cards so she has no ability to pay for downloads from  
9 Pacer or the Orange County Court website in the court where the Judges are allowing  
10 proceedings to move forward against Eve Doe with no regard for the fact that the lawyers are  
11 conspiring together to obtain \$ 100 million dollars for no reason while Eve Doe suffers  
12 debilitating medical conditions caused by defendants abuse and has no shelter because of  
13 defendants abuse and continues to be stalked by multiple men that she does not know. Eve Doe  
14 has no ability to download more than the limited \$30 per quarter in documents from pacer.  
15  
16  
17  
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20 **Judge Hon Frimpong who signed order on June 30, 2023 to remove new assigned**  
21 **Judges Honorable George Wu And Honorable Alka Sagar did so improperly with no legal basis**  
22 **to do so.**  
23

24  
25 **The judges are not duplicating work as the judges have yet to make any legal rulings**  
26 **employing the law nor have they heard a motion all they have done is further dehumanize**  
27  
28

1 plaintiff and state that all of the suffering she has endured is not worthy of a trial or the respect  
2 to be shown to all human beings by Judges acting under the color of the law.

3  
4  
5 **Plaintiff respectfully requests that she proceed to trial and not be deprived of her**  
6 **constitutional rights human rights and civil rights any longer.**

7  
8 **THUS DISQUALIFICATION IS REQUIRED IN THE INTERESTS OF JUSTICE**

9  
10 In *DCH Health Servs. Corp. v Waite* (2002) 95 Cal.App. 4th 829, 833 a California Court of  
11 Appeal stated that recusal may be required on the basis of a mere appearance of impropriety.

12 Other cases decided by the California Courts of Appeal have stated that actual bias need not  
13 be present. *Roitz v Coldwell Banker Residential Brokerage Co.*, (1998) 62 Cal.App.4th 716, 723.

14  
15 If an average person could entertain doubt about the judge's impartiality, disqualification is  
16 mandated. *Catchpole v Brannon* (1995) 36 Cal.App. 4th 237, 246.

17  
18 An appellate court will not speculate about whether the bias was actual or merely apparent;  
19 reversal is required in such a case, with remand of the matter to a different judge for a new hearing on  
20 all issues. *In re Wagner* (2005) 127 Cal.App 4th 138, 147–149; see also *Roitz v Coldwell Banker*  
21 *Residential Brokerage Co.*, supra, 62 Cal.App 4th at p. 723; *Catchpole v Brannon*, supra, 36 Cal.App.  
22 4th at p. 247.

23  
24 One situation in which bias was found involved a judge who interrupted counsel and a litigant  
25 on several occasions. See *Dodds v Commission on Judicial Performance* (1995) 12 Cal.App. 4th 163,  
26 176–177.

1 The numerous instances of bias by Judge Steve Kim toward Plaintiff in this case provide  
2 ample justification for the disqualification of Judge Steve Kim.

3 When the judge has exhibited numerous instances of bias toward a party in the case, such that  
4 the average person might justifiably doubt whether the judge could be impartial, there is ample  
5 justification for disqualifying the judge. *Catchpole v Brannon*, supra, 36 Cal.App. A4th at p. 262.

6 ///

7  
8 **III.**

9 **CONCLUSION**

10 Defendant respectfully requests that Judge Hon. Maame Frimpong and Judge Hon. Steve Kim  
11 be disqualified from presiding over any further proceedings in this case on the grounds that the fact  
12 that Judge Steve Kim has a substantial financial interest in a party to this action and their other  
13 actions as stated herein would clearly cause anyone aware of the facts to reasonably entertain a doubt  
14 that the judge would be able to be impartial.

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18 *Eve Emancipation Doe*

19 Dated July 1, 2023

Eve Doe

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMBER DOE,

Plaintiff,

-against-

SEQUOIA CAPITAL, *et al.*,

Defendants.

23-CV-5881 (LTS)

ORDER

LAURA TAYLOR SWAIN, Chief United States District Judge:

Plaintiff filed this action *pro se*. On August 1, 2023, the Court ordered that the action be transferred to the United States District Court for the Southern District of California, “[f]or the convenience of parties and witnesses, in the interest of justice.” 28 U.S.C. § 1404(a). Three days later, and before the Clerk’s Office electronically transferred the action to the Southern District of California, Plaintiff filed an opposition, and an amended opposition, in response to the August 1, 2023 order. (ECF 9-10.) The Court liberally construes these submissions as a motion brought under Rule 60(b) of the Federal Rules of Civil Procedure. *See Triestman v. Fed. Bureau of Prisons*, 470 F.3d 471, 474 (2d Cir. 2006); *see also Tracy v. Freshwater*, 623 F.3d 90, 101 (2d Cir. 2010) (The solicitude afforded to *pro se* litigants takes a variety of forms, including liberal construction of papers, “relaxation of the limitations on the amendment of pleadings,” leniency in the enforcement of other procedural rules, and “deliberate, continuing efforts to ensure that a *pro se* litigant understands what is required of him”) (citations omitted). After reviewing the arguments in Plaintiff’s submissions, the Court denies the motion.

**DISCUSSION**

Under Fed. R. Civ. P. 60(b), a party may seek relief from a district court’s order for the following reasons:

(1) mistake, inadvertence, surprise, or excusable neglect; (2) newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b); (3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or other misconduct of an opposing party; (4) the judgment is void; (5) the judgment has been satisfied, released, or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or (6) any other reason justifying relief.

Fed. R. Civ. P. 60(b).

The Court has considered Plaintiff's arguments, and even under a liberal interpretation of her motion, Plaintiff has failed to demonstrate that any of the grounds listed in the first five clauses of Fed. R. Civ. P. 60(b) apply. Therefore, the motion under any of these clauses is denied.

To the extent that Plaintiff seeks relief under Fed. R. Civ. P. 60(b)(6), the motion is also denied. "[A] Rule 60(b)(6) motion must be based upon some reason other than those stated in clauses (1)-(5)." *United Airlines, Inc. v. Brien*, 588 F.3d 158, 175 (2d Cir. 2009) (quoting *Smith v. Sec'y of HHS*, 776 F.2d 1330, 1333 (6th Cir. 1985)). A party moving under Rule 60(b)(6) cannot circumvent the one-year limitation applicable to claims under clauses (1)-(3) by invoking the residual clause (6) of Rule 60(b). *Id.* A Rule 60(b)(6) motion must show both that the motion was filed within a "reasonable time" and that "'extraordinary circumstances' [exist] to warrant relief." *Old Republic Ins. Co. v. Pac. Fin. Servs. of America, Inc.*, 301 F.3d 54, 59 (2d Cir. 2002) (per curiam) (citation omitted).

Plaintiff has failed to demonstrate that extraordinary circumstances exist to warrant relief under Fed. R. Civ. P. 60(b)(6). *See Ackermann v. United States*, 340 U.S. 193, 199-202 (1950).

### CONCLUSION

Plaintiff's opposition and amended opposition to the Court's order transferring this action to the Southern District of California (ECF 9-10), construed as brought under Fed. R. Civ. P. 60(b), is denied.



This action is closed. Any relief Plaintiff seeks must be filed in the transferee court.

The Court certifies under 28 U.S.C. § 1915(a)(3) that any appeal from this order would not be taken in good faith, and therefore *in forma pauperis* status is denied for the purpose of an appeal. *See Coppedge v. United States*, 369 U.S. 438, 444-45 (1962).

SO ORDERED.

Dated: August 14, 2023  
New York, New York

/s/ Laura Taylor Swain

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LAURA TAYLOR SWAIN  
Chief United States District Judge

**quinn emanuel** trial lawyers | silicon valley

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July 20, 2023

**VIA FEDEX**

Chief Judge Laura Taylor Swain, Courtroom 17C  
District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Amber Doe v. Sequoia Capital et al.*, Case 1:23-cv-05881-UA (S.D.N.Y. 2023)

Chambers of the Honorable Chief Judge Laura Taylor Swain:

For the Court's convenience, attached please find two decisions issued by Judge Frimpong of the District Court for the Central District of California regarding these same parties and claims.

Respectfully,



Diane M. Doolittle

cc: Amber Doe, 8306- 2020 Wilshire Blvd., Los Angeles, CA 90211

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

AMBER DOE,

CASE NUMBER

2:23-cv-02280-MEMF (SK)

v.

PLAINTIFF(S)

MICHAEL LEWIS GOGUEN, et al.,

ORDER RE REQUEST TO PROCEED  
IN FORMA PAUPERIS

DEFENDANT(S)

IT IS ORDERED that the Request to Proceed *In Forma Pauperis* is hereby GRANTED.

Date

United States Magistrate Judge

IT IS RECOMMENDED that the Request to Proceed *In Forma Pauperis* be DENIED for the following reason(s):

- ☐ Inadequate showing of indigency ☒ District Court lacks jurisdiction  
☒ Legally and/or factually patently frivolous ☒ Immunity as to many defendants  
☒ Other: Failure to state a claim on which relief may be granted.

Comments:

SEE ATTACHMENT.

May 15, 2023

/s/ Steve Kim

Date

United States Magistrate Judge

IT IS ORDERED that the Request to Proceed *In Forma Pauperis* is hereby:

- ☐ GRANTED  
☒ DENIED (see comments above). IT IS FURTHER ORDERED that:  
☐ Plaintiff SHALL PAY THE FILING FEES IN FULL within 30 days or this case will be dismissed.  
☒ This complaint is DISMISSED without leave to amend.  
☒ This action is DISMISSED with prejudice. All pending motions are DENIED as moot.

May 22, 2023

Date

United States District Judge

**ATTACHMENT**

***Amber Doe v. Michael Lewis Goguen, et al.***

**Case No. 2:23-cv-02280-MEMF (SK)**

Plaintiff Amber Doe seeks to proceed in forma pauperis (IFP) with a 1,700-page complaint ostensibly naming more than 150 defendants, purporting to allege over 50 causes of action, and attaching several sexually explicit or salacious images (which the court had to order redacted from the public docket). The named defendants include not only the lead defendant, Michael Lewis Goguen, who recently secured a civil harassment restraining order against plaintiff in San Mateo County Superior Court, but also every judge or lawyer conceivably connected to that state court case. The discursive complaint also names the United States of America, the State of California, "Human Traffickers," "Strip Clubs," "Model Studios," "Rock Stars," the "World Bank," a "Saudi Arabian oil company," the "US mint," up to 10 million unidentified Does, and nearly every major retail, technology, communication, news media, entertainment, sports, health, food and beverage, oil, or automotive company in the country. From what the court can intelligibly discern (which is very little), plaintiff seeks over \$1 billion in damages, the opening of federal criminal investigations, and other coercive extrajudicial orders.

Plaintiff's IFP application should be denied, and the complaint accordingly dismissed without leave to amend, for any or all of these reasons:

1. The court has no subject matter jurisdiction. See Fed. R. Civ. P. 12(h)(3) ("If the court determines at any time that it lacks subject-matter jurisdiction, the court must dismiss the action"). The complaint alleges no proper basis for diversity jurisdiction under 28 U.S.C. § 1332(a). To the contrary, the civil cover sheet to the complaint<sup>1</sup> notes that both plaintiff and (at least one) defendant are both from the same state (ECF 1-6 at 1), thereby eliminating diversity jurisdiction. See *Hunter v. Phillip Morris USA*, 582 F.3d 1039, 1043 (9th Cir. 2009) (§ 1332 requires "complete diversity," meaning citizenship of "each plaintiff is different from that of each defendant"). And the court need not blindly assume that the amount-in-controversy requirement can be met by plaintiff's facially implausible demand for more than \$1 billion in damages. See *Crum v. Circus Circus Enters.*, 231 F.3d 1129, 1131 (9th Cir. 2000) (federal courts need not accept alleged amount in controversy claimed with no good faith); *Geographic Expeditions, Inc. v. Estate of Lhotka ex rel. Lhotka*, 599 F.3d 1102, 1106 (9th Cir. 2010)

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<sup>1</sup> This is not to suggest that information on a civil cover sheet can replace a properly pled complaint. See *Payne v. JP Morgan Chase Bank N.A.*, 2015 WL 12832118, at \*1 n.1 (C.D. Cal. Sept. 22, 2015) ("[B]ecause the cover sheet is not a pleading and does not amend or modify a pleading, its contents cannot satisfy the standards governing federal pleadings."); *McKinney v. Law Off. of James Duncan*, 2010 WL 668027, at \*7 (N.D. Cal. Feb. 19, 2010) ("A Civil Cover Sheet does not supplant the complaint."). But the lack of proper jurisdictional facts even on the civil cover sheet only further exposes the patent jurisdictional deficiencies of the complaint.

(federal courts need not accept amount in controversy alleged on face of complaint if “it is obvious that the suit cannot involve the necessary amount”).

Nor does the complaint allege any proper basis for federal question jurisdiction under 28 U.S.C. § 1331. Indeed, the only claimed basis for jurisdiction—again as reflected on the complaint’s civil cover sheet—is as a suit against the United States. (ECF 1-6 at 1). But not only does the United States enjoy “sovereign immunity” from civil suit (absent express waiver), *DaVinci Aircraft, Inc. v. United States*, 926 F.3d 1117, 1127 (9th Cir. 2019), the complaint purports to be only a civil suit about the “torts” of “other personal injury” or “other fraud.” (ECF 6-1 at 1). Federal courts have no general subject matter jurisdiction over common law torts. *See generally Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994); *Provincial Gov’t of Marinduque v. Placer Dome, Inc.*, 582 F.3d 1083, 1086 (9th Cir. 2009); *Cato v. United States*, 70 F.3d 1103, 1106 (9th Cir. 1995). And while the complaint cites to random federal statutes and purports to invoke the protections of the federal Constitution, it states with no “sufficient particularity” any pertinent facts “creating jurisdiction” under federal law. *St. Paul Mercury Indem. Co. v. Red Cab Co.*, 303 U.S. 283, 287 n.10 (1938); *see Bell v. Hood*, 327 U.S. 678, 682-83 (1946) (suit may “be dismissed for want of jurisdiction where the alleged claim under the Constitution or federal statutes clearly appears to be immaterial and made solely for the purpose of obtaining jurisdiction or where such a claim is wholly insubstantial and frivolous.”); *Denton v. Agents of Oregon*, 2012 WL 5342541, at \*1 (D. Or. Oct. 29, 2012) (“[P]laintiff’s conclusory allegations, bare citation to the Constitution, and passing references to federal issues are insufficient to establish subject matter jurisdiction.”). In short, jurisdiction under § 1331 is lacking because there is no “well-pleaded complaint” here showing that plaintiff’s “right to relief necessarily depends on resolution of a substantial question of federal law.” *Franchise Tax Bd. v. Constr. Laborers Vacation Tr.*, 463 U.S. 1, 27-28 (1983).

Finally, with no original subject matter jurisdiction, the court has no supplemental jurisdiction over any state-law claims. *See* 28 U.S.C. § 1367(c).

2. The complaint “seeks monetary relief against” many defendants who are “immune from such relief.” 28 U.S.C. § 1915(e)(2)(B). As noted, the United States enjoys sovereign immunity from civil suits (absent express waiver, which nothing in the complaint supports). Similarly, the State of California is immune from damages suits under the Eleventh Amendment, as are the State’s courts. *See Simmons v. Sacramento Cnty. Superior Ct.*, 318 F.3d 1156, 1161 (9th Cir. 2003); *Greater Los Angeles Council on Deafness, Inc. v. Zolin*, 812 F.2d 1103, 1110 (9th Cir. 1987). And judicial immunity applies to the decisions of individual judges in the suits over which they preside. *See Mireles v. Waco*, 502 U.S. 9, 11-12 (1991) (Judicial “immunity applies even when the judge is accused of acting maliciously and corruptly.”) (cleaned up).

3. The complaint is barred the *Rooker-Feldman* doctrine. At root, the complaint appears to be an unauthorized collateral attack on the judgment of the San Mateo County Superior Court, which entered a civil harassment restraining order against plaintiff and in favor of defendant Michael Goguen. But “*Rooker-Feldman* prohibits a federal district court from exercising subject matter jurisdiction over a suit that is a de facto appeal from a state court judgment.” *Kougasian v. TMSL, Inc.*, 359 F.3d 1136, 1139 (9th Cir. 2004). Thus, as far as the complaint invites review of “injuries caused by state-court judgments” and seeks “rejection of those judgments,” it is foreclosed by the *Rooker-Feldman* doctrine. *Exxon Mobil Corp. v. Saudi Basic Indust. Corp.*, 544 U.S. 280, 284 (2005).

4. The complaint “fails to state a claim on which relief may be granted” and is “frivolous or malicious.” 28 U.S.C. § 1915(e)(2)(B). To survive the pleading stage, a civil complaint must set forth “sufficient factual matter, accepted as true, to ‘state a claim to relief that is plausible on its face.’” *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)). And to prevent “abusive or captious litigation,” the IFP statute “authorizes federal courts to dismiss” any action that “is frivolous or malicious.” *Neitzke v. Williams*, 490 U.S. 319, 325 (1989) (cleaned up). Frivolous complaints are those that “lack[] an arguable basis either in law or in fact.” *Id.* And a “complaint is malicious if it suggests an intent to vex defendants or abuse the judicial process by relitigating claims decided in prior cases.” *Young Yil Jo v. Six Unknown Names Agents*, 2006 WL 3483429, at \*1 (E.D. Cal. Dec. 1, 2006).

The complaint fails all these pleading standards. It contains “incomprehensible rambling[s]” with no coherent factual allegations or intelligible legal claims. *United States ex rel. Cafasso v. Gen. Dynamics C4 Sys., Inc.*, 637 F.3d 1047, 1059 (9th Cir. 2011). “Even measured by the liberal standards accorded pro se litigants,” a complaint like the one here—“rambling and garbled” or “incomprehensible”—must be dismissed. *Burgess v. City & Cty. of S.F.*, 955 F.2d 47, 47 (9th Cir. 1992); see *United States v. Banks*, 639 F. App’x 69, 70 (3d Cir. 2016) (pro se pleading “depicting various handwritten figures and rambling references” but with no comprehensible “argument, claim, or request for relief . . . is not a type of pleading requiring attention by the court”). The complaint is also a quintessential “shotgun pleading” which (1) fails to differentiate between defendants such that it is impossible to determine which defendant is accused of what, (2) provides no factual allegations that can be logically organized into each count of the complaint, and (3) contains many conclusory, vague, and immaterial facts unconnected to a particular cause of action. *Jaime v. Parts Auth. LLC*, 2021 WL 3055041, at \*7 (D. Ariz. July 20, 2021). Such shotgun complaints may be summarily dismissed, see *Almont Ambulatory Surgery Ctr., LLC v. UnitedHealth Grp., Inc.*, 2015



WL 12777092, at \*4 (C.D. Cal. Oct. 23, 2015), because even “a liberal interpretation of a civil rights complaint may not supply essential elements of the claim that were not initially pled.” *Bruns v. Nat’l Credit Union Admin.*, 122 F.3d 1251, 1257 (9th Cir. 1997) (cleaned up). And as much as the complaint is understandable at all, it appears to have no purpose other than a vexatious one of circumventing the civil harassment restraining order entered by the San Mateo County Superior Court.

5. Leave to amend would be futile. “When a case may be classified as frivolous or malicious, there is, by definition, no merit to the underlying action and so no reason to grant leave to amend.” *Lopez v. Smith*, 203 F.3d 1122, 1127 n.8 (9th Cir. 2000). Moreover, plaintiff had a chance to explain (if possible) why her complaint should be allowed to proceed given its manifest deficiencies. (ECF 12). That order instructed plaintiff not to file documents with “any sexually explicit or salacious content of any kind” and not to “reference (directly or indirectly) statements that are the subject of the civil harassment restraining order issued by the San Mateo County Superior Court on March 6, 2023.” (*Id.*). Doing so, the order warned, would lead to involuntary dismissal for violating court orders. (*Id.*). Yet rather than appropriately respond to that order, plaintiff filed just three days later an application for a temporary restraining order—comprising more than 140 pages—which not only referenced prohibited statements from the state court restraining order but again included sexually explicit content. (ECF 13). That flagrant violation of the court’s order required another sealing and redaction order. (ECF 17). And not only did plaintiff ultimately fail to show cause why her complaint should not be dismissed for the many deficiencies outlined here (ECF 23), she doubled down by filing a defective motion for default judgment (ECF 24, 29) and a 500-page motion for summary judgment supported by a 1,700-page declaration with exhibits (ECF 28, 30-31). Under these egregious circumstances, leave to amend the complaint should be denied as futile and this action should be dismissed with prejudice. *See* Fed. R. Civ. P. 41(b); L.R. 41-1; *Malone v. U.S. Postal Serv.*, 833 F.2d 128, 134 (9th Cir. 1987). Any pending motions may then be denied as moot.

JS-6

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

Jane Freedom Doe	CASE NUMBER
	2:23-cv-04723-MEMF-SK
v. PLAINTIFF(S)	
Quinn Emanuel Urquhart and Sullivan LLP, et al.	ORDER ON REQUEST TO PROCEED IN FORMA PAUPERIS (NON-PRISONER CASE)
DEFENDANT(S)	

The Court has reviewed the Request to Proceed *In Forma Pauperis* (the "Request") and the documents submitted with it. On the question of indigency, the Court finds that the party who filed the Request:

- ☒ is not able to pay the filing fees. ☐ is able to pay the filing fees.
- ☐ has not submitted enough information for the Court to tell if the filer is able to pay the filing fees. This is what is missing:

## IT IS THEREFORE ORDERED that:

- ☐ The Request is GRANTED.
- ☐ Ruling on the Request is POSTPONED for 30 days so that the filer may provide additional information.
- ☐ The Request is DENIED because the filer has the ability to pay.
- ☒ As explained in the attached statement, the Request is DENIED because:
- ☒ The District Court lacks ☒ subject matter jurisdiction ☐ removal jurisdiction.
  - ☒ The action is frivolous or malicious.
  - ☒ The action fails to state a claim upon which relief may be granted.
  - ☒ The action seeks monetary relief against defendant(s) immune from such relief.

## IT IS FURTHER ORDERED that:

- ☐ Within 30 days of the date of this Order, the filer must do the following:

If the filer does not comply with these instructions within 30 days, this case will be DISMISSED without prejudice.

- ☒ As explained in the attached statement, because it is absolutely clear that the deficiencies in the complaint cannot be cured by amendment, this case is hereby DISMISSED ☐ WITHOUT PREJUDICE ☒ WITH PREJUDICE.
- ☐ This case is REMANDED to state court as explained in the attached statement.

June 16, 2023

Date

  
United States District Judge



This action is duplicative of one the Court previously dismissed with prejudice. See Doe v. Goguen, et al., 2:23-cv-02280-MEMF-SK. Accordingly, this newly filed action also must be dismissed with prejudice. See Cato v. United States, 70 F.3d 1103, 1105 n.2 (9th Cir. 1995) (affirming district court's dismissal and noting that "[t]here is no abuse of discretion where a district court dismisses under § 1915[] a complaint that merely repeats pending or previously litigated claims.") (citation and internal quotations omitted); see also Diamond v. City of Los Angeles, 700 F. App'x 727, 728 (9th Cir. 2017) (district court did not abuse its discretion by dismissing action that was duplicative of plaintiff's earlier action against the same defendant in the same district court) (citation omitted).

(attach additional pages if necessary)

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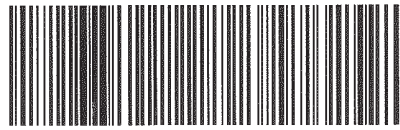


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